



St Paul's School
FOUNDED 1509

Health and Safety Policy

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This policy is available on the Handbook page of the School Intranet and policies page of the School website and can be made available in large print or other accessible format if required; such requests can be made to policyquery@stpaulsschool.org.uk

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SECTION A STATEMENT OF INTENT

St. Paul's School, St Paul's Juniors (together defined as "the School") and its Governing Body are committed to providing, so far as is reasonably practicable, workplaces and work practices which are safe and healthy for employees, pupils, visitors and all those who may be affected by the School's activities. Both Schools attach the utmost importance to health and safety and will comply with the provisions of the Health and Safety at Work Act 1974 and all relevant regulation.

The School is committed to:

- Providing a safe and healthy working and learning environment.
- Preventing accidents and work-related ill health.
- Meeting our legal responsibilities and obligations under health and safety legislation as a minimum.
- Assessing all risks to anyone who could be affected by any of the School's curricular or non-curricular activities and putting in place measures to control these risks.
- Ensuring safe working methods and providing safe work equipment.
- Providing effective information, instruction, training and supervision.
- Consulting with employees and their representatives on health and safety matters.
- Monitoring and reviewing our safety arrangements and prevention measures to ensure they are effective.
- Ensuring adequate welfare facilities exist throughout the School.
- Ensuring adequate resources are made available for health and safety issues, so far as is reasonably practicable.

Health and safety management procedures will be adopted, and responsibilities appropriately assigned, to ensure the above commitments can be met. All Governors, staff and pupils will play their part in its implementation.

Signed by Richard Cassell, Chair of Governors:



Date:

30 August 2025

SECTION B ORGANISATION (Delegation of Tasks)

1 Introduction

- 1.1 The ultimate responsibility for health and safety rests with the Governing Body, as the employer. It has delegated the day-to-day running of the School, including the management of health and safety, to the High Master.
- 1.2 The High Master is responsible for the day-to-day management of Health and Safety but has delegated the detailed implementation and management of the School's policy to the Director of Operations.
- 1.3 The Head (of the Junior School), with the Director of Operations, will ensure that this Policy is adhered to at St Paul's Juniors.
- 1.4 The Boarding Housemaster, with the Director of Operations, will ensure that this Policy is adhered to at the Boarding Houses.
- 1.5 In order to achieve compliance with the Statement of Intent the School has assigned additional responsibilities to assigned to staff members as detailed in this Policy. An organisational chart for H&S Management is attached at Appendix 1.
- 1.6 This Policy shall be reviewed, revised where necessary, and re-approved annually by the Governing Body.
- 1.7 A copy of this policy can be made available in larger print or other accessible formats if required and is available on the School website.
- 1.8 The School engages a number of external consultants to provide specialist advice on specific matters relating to Health & Safety. A list of these consultants is attached at Appendix 2.

2 The Governing Body

- 2.1 The Governing Body is responsible for ensuring that:
 - a) The health and safety policy statement is clearly written and it promotes a positive attitude towards safety in staff and pupils.
 - b) The High Master is aware of their health and safety responsibilities and has sufficient experience, knowledge and training to perform the tasks required.
 - c) Ensure clear roles and responsibilities have been created to assess any significant risks and ensure that safe working practices are adopted.
 - d) Sufficient funds are set aside with which to operate safe working practices.
 - e) Health and safety performance is monitored, failures in health & safety policy or implementation recognised, and policy and procedure revised as necessary.

3 High Master

- 3.1 Reporting to the Governing Body, the High Master has the overall responsibility for ensuring that the Health and Safety Policy is effectively implemented and that proper resources are made available in order to achieve this.
- a) The High Master will plan ahead as necessary to make human, financial and other resources available to secure a high standard of health and safety management, taking competent advice on matters of health and safety where relevant.
 - b) They provide the final authority on matters concerning health and safety at work.
 - c) They delegate specific responsibility for the implementation and monitoring of the Health and Safety Policy to the Director of Operations.
 - d) The High Master will make decisions on health and safety issues alongside the Director of Operations based on a proper assessment of any risks to health and safety, and will ensure the control of those risks in an appropriate manner.

4 Executive Responsibility for Health and Safety

- 4.1 The Director of Operations is responsible for the safe management and upkeep of the School's premises and for the management of traffic within the School site. They are also the School's Head Fire Marshal and responsible for the duties listed under **I** in the Annex.
- 4.2 The Director of Operations, in collaboration with the appropriate manager, head of department or supervisor, is responsible for duties **e** to **u** in the Annex.
- 4.3 The Head of Estates is responsible for planning for the admission onto the site and for the health and safety of visitors, including contractors, and for carrying out related risk assessments.
- 4.4 All those with management responsibility must notify the Director of Operations of any significant anticipated, new or recently identified risks in their area of responsibility, the risk control measures needed, and report breaches of the Policy or arrangements for the management of health and safety.
- 4.5 When managers, heads of department, or any member of staff with supervisory duties are absent for significant periods, they must ensure that their duties are delegated effectively and report the matter in writing to the Director of Operations.
- 4.6 Each manager, head of department and supervisor must ensure, in accordance with the law, the safe management of all activities under their authority, for the planning, implementation and monitoring of measures to control risks, and for ensuring that all activities are carried out, or supervised by, competent people with the necessary authority. In particular, the duties connected with the responsibilities listed in the Annex sections **b**, **c**, **d**, **e**, **f**, **g** and **h** are delegated to these persons, with whom written local management arrangements can be found.

- 4.7 The following employees have responsibility for ensuring compliance with the policy as it applies to their particular function. The Assistant Head (Co-curricular) is the Educational Visits Co-ordinator (“EVC”) for St Paul’s and the SPJ Assistant Head is the coordinator for St Paul’s Juniors; the Head of Estates is responsible for the asbestos management plan, legionella risk assessment and control; the School Vehicle Manager is responsible for minibus/transport management; the Head of Physics is the radiation protection supervisor; the Director of Operations in conjunction with the Head Nurse is responsible for ensuring all accidents and incidents are properly recorded and actioned, and for ensuring compliance with all statutory health and safety legislation.
- 4.8 All those with health and safety duties will be provided with sufficient time to undertake their duties and with the training necessary to enable them to discharge their tasks and duties in a competent manner.

5 First Aid

- 5.1 The School Nurses, under the leadership of the Head Nurse, at St Paul’s School and St Paul’s Juniors (and under line management of the Deputy Head, Co-Curricular,) are responsible for checking the first aid facilities, first aid kits and eye wash stations. Further details are contained within the [First Aid Policy](#). A cohort of approximately 130 people are responsible for administering first aid as a first response, and is coordinated by the EVCs, Director of Operations and Head Nurse to ensure that there is appropriate first aid cover.

6 Occupational Health

- 6.1 The School Doctors, in conjunction with the Head Nurse, are responsible for providing work-related medical advice to managers and staff, for advising on preventative programmes for protection against work-related infectious disease and musculoskeletal disorders, and for providing early intervention in any cases of work-related health problems. Where required, risk assessments will be completed by the Director of Operations or other suitably qualified persons and provided to the Human Resources department.

7 Accident/Incident Reporting

- 7.1 All accidents, incidents and occupational ill health should be reported as soon as possible via the appropriate form on the intranet. This will be shared and recorded by the nurses, Director of Operations and any other relevant staff members.

Notification to the enforcing authority at the HSE Incident Contact Centre at www.hse.gov.uk/riddor is the responsibility of the Director of Operations. The Director of Operations and Head Nurse will brief on any trends emerging from accidents and incidents reports at the termly Health and Safety committee meetings. Further information on this can be found in the [Incident Reporting and Investigations Policy](#).

8 Critical Incident Plan

- 8.1 The School's Critical Incident Planning Group will ensure that the [Critical Incident Plan](#) is reviewed and tested twice in each School year. The plan covers foreseeable major incidents, including the need to shelter-in and evacuate off-site, and details actions to be taken.
- 8.2 As part of the Critical Incident Plan arrangements are covered for overnight emergencies, specifically when boarders are on site. This includes detailed procedures for the safe evacuation of boarders to designated accommodation and communication to relevant stakeholders including parents and carers.

9 Advisory Arrangements

9.1 Health & Safety Committee

- 9.1.1 The Health and Safety Committee meets once a term; the Committee's Chairman is appointed by the High Master. The membership of the Committee consists of the High Master, a representative of the Governing Body, the Head, the Director of Operations, and a number of staff appointed by the Chairman who are involved in health and safety matters. This may include the Head of Estates, Head Nurse, various Head of Departments/Academic staff and Support staff, external representatives (i.e. Catering Manager and Cleaning Manager) and an external Health and Safety advisor.
- 9.1.2 The purpose of the Committee is to consult employees on matters concerning Health and Safety including any changes in regulations. Its aim is to review the investigations of any significant accidents and remedial actions taken; to consider incidents, cases of ill health or defects, including RIDDOR reports, and their causes; to discuss training requirements; to monitor progress on achieving compliance with recommendations from an authoritative source; to monitor the effective implementation of the Health and Safety Policy within the School and annually to review and update the Policy in the light of new regulation and guidance and the assessment of any significant risks arising from new activities.
- 9.1.3 Detailed minutes are kept and a copy forwarded to all members of the Committee, the Executive Committee and the Governing Body through the nominated Governor within seven days of each meeting.
- 9.1.4 The School retains the services of a specialist Health and Safety consultant to provide independent advice.

9.2 Consultation with Employees

- 9.2.1 Employees are consulted directly in accordance with the provisions of the Health and Safety (Consultation with Employees) Regulations 1996.

9.3 Individual Responsibility

9.3.1 All employees, pupils and other persons entering onto School premises who are involved in School activities are responsible for taking care of themselves and any others who may be affected by their actions and omissions. Those in charge of visitors, including contractors, must ensure that the visitors adhere to the relevant requirements of this Health and Safety policy.

9.3.2 Each individual must:

- Make sure that work is carried out in accordance with this Policy, the School's procedures, risk assessments and appropriate methods of working.
- Protect themselves and others by using any guards or safety devices provided; wear the personal protective equipment provided and never interfere with or misuse anything provided in the interests of health and safety.
- Only carry out activities which they are competent to undertake.
- Adhere to training and instructions received.
- Inform their immediate line manager, head of department or supervisor of any new hazards identified.
- Give all visitors, including contractors, a named contact with whom to liaise.
- Offer any advice and suggestions that they think may improve health and safety.
- Report all accidents, ill health, fires, incidents and defects as soon as practicable.
- Be familiar with the location of fire alarm points, fire escape routes, fire procedures and firefighting equipment.
- Co-operate with the School's management and follow all instructions given.
- Ensure the safety of their visitors.
- Inform the Director of Operations before proceeding with any activities which involve significantly new or newly identified risks.
- Ensure that fire escape routes are kept clear.
- Make sure that the conditions of local authority licences are observed.
- Ensure the safe disposal of hazardous wastes in compliance with the School's Health and Safety policy and procedures and legal requirements.
- Ensure that any apparent hazard or danger is reported to the appropriate person.
- Ensure that School vehicles are used in accordance with this Policy and the [Driving for Work Policy](#).

9.3.3 In case of doubt about any Health and Safety matters, employees should consult their line manager or the Director of Operations (or in their absence the High Master).

Annex

It is the High Master's responsibility directly or through delegation, as detailed previously, and in accordance with the law to:

- a) Ensure compliance with this Health and Safety policy; to ensure that the necessary resources for implementation are available; and to report to the Governors at least once a term.
- b) Plan, organise, control, monitor and review arrangements for Health and Safety for employees, for pupils, for visitors including contractors and others affected by our work activities – this includes committing to writing local management arrangements for safety.
- c) Assess risks and commit assessments to writing.
- d) Ensure that risks to health and safety arising from the School's activities are controlled and that all activities are carried out, or supervised by competent people who have the authority necessary to meet their responsibilities.
- e) Ensure that information, training and instruction are provided.
- f) Make appropriate provision for occupational and pupil health.
- g) Investigate and keep a record of accidents, occupational ill health, hazardous incidents and fires.
- h) Post warning signs and notices.
- i) Ensure that first aid personnel are appointed and that all provisions made for first aid are checked regularly.
- j) Ensure that the conditions of licences are observed.
- k) Ensure the safe disposal of hazardous waste.
- l) Ensure that fire safety risk assessments are comprehensive; that their requirements are satisfied; and in particular to:
 - m) Produce and maintain fire risk assessments and an emergency fire evacuation plan;
 - n) Be responsible for fire safety training;
 - o) Arrange practice drills;
 - p) Check that any shelter-in procedures are followed;
 - q) Check the adequacy of firefighting equipment and ensure its regular maintenance;
 - r) Check that fire escape routes and fire exit doors are kept unobstructed and that fire doors operate correctly;
 - s) Ensure that fire detection, alarm and emergency lighting systems are properly installed, maintained and tested;
 - t) Arrange fire safety inspection once per year and additional consultation whenever there are changes to the fire safety risk assessment;
 - u) Keep relevant records; and
 - v) Include fire safety in the regular Health and Safety reports to the Governors.

SECTION C ARRANGEMENTS

C1: Organisational Arrangements

1 Risk Assessment

- 1.1 The Management of Health and Safety at Work Regulations require a broad risk assessment of the work and activities of the School. The School will assess all reasonably foreseeable risks and others which are identified by specific Health and Safety regulations. The safety policy documentation, together with the School's documented regular inspection and assessment regimes, form the basis of the broad risk assessment used to ensure that a suitable and sufficient check of areas or tasks is carried out to identify any hazards which might exist there.
- 1.2 The School has a [Risk Assessment Policy](#) which details the types of risk assessments that are carried out both in the School grounds and off-site and should be read in conjunction with this policy.
- 1.3 Many different persons within the School are required to carry out risk assessments as part of their duties under the Health and Safety Policy. Risk assessment training materials are available on the [intranet](#) as well as e-Learning modules which can be accessed through the [Operations Coordinator](#).

2 First Aid

- 2.1 This is a summary of the [First Aid Policy](#) which is available on the School website and the Intranet as a standalone policy.
- 2.2 First Aid notices and lists are displayed on the intranet and throughout the site to indicate the location of the nearest first aid box and the names of nominated First Aiders and Emergency First Aiders.
- 2.3 The first aid boxes are clean, have lids, are marked with a white cross on a green background and are stocked to the minimum prescribed in the approved contents list given below. Generally, only those items which appear on the list are permissible, however, where specific risks have been identified appropriate additions are made. Contents are checked annually and restocked if necessary by the Nurses.
- 2.4 At least one First Aider is always present during the normal School day and an Emergency First Aider is present as far as is practicable when teaching, other activities or work are taking place. A First Aider will always be on site during the School holidays.
- 2.5 The appropriate number of First Aiders and Emergency First Aiders are identified via a First Aid Needs Assessment and after additional relevant factors have been considered, including layout of premises, foreseeable absences of first aid personnel and the numbers taking part in these activities. The HR Department and Operations and Compliance Manager maintain a list of First Aiders and Emergency First Aiders.

- 2.6 First Aiders are trained in accordance with the standards laid down by the Health and Safety Executive and are all certificated. First Aid certificates are issued for a three-year period only and at the end of this three-year period further re qualification and certification is necessary. The Outdoor First Aid certificates are issued for a two- or three-year period, depending upon the provider.
- 2.7 Emergency First Aiders complete a shorter, one-day course. The certificates are also issued for three years. Emergency First Aiders can, if necessary, administer first aid. Emergency First Aiders have had at least four contact hours of Emergency First Aid Training provided for them.

3 Recording of Accidents

- 3.1 The School has a legal responsibility to ensure that all accidents occurring on the School's site, or to pupils and staff involved in School activities outside the School, are recorded.
- 3.2 Forms are available for recording the details of all injuries etc which occur 'at work'. An entry must be completed as soon as possible after any accident occurs and given to the School Nurse. The information should be completed on the [accident form](#). This will be shared and recorded by the nurses, Director of Operations and any other relevant staff members.
- 3.3 Incidents, dangerous occurrences/observations and near misses should be reported promptly on the [incident report form](#). Notification to the enforcing authority at the HSE Incident Contact Centre at www.hse.gov.uk/riddor is the responsibility of the Director of Operations. The Director of Operations and Head Nurse will brief on any trends emerging from accidents and incidents reports at the termly Health and Safety Committee meetings. Further information on this can be found in the [Incident Reporting and Investigations Policy](#).
- 3.4 NB. Accidents to pupils and members of the public which are attributable in some way to work organised by the School (e.g. an accident during a chemistry experiment), or the defective condition of premises, equipment or plant, or lack of or defective supervision, where injury is suffered, must be recorded as an accident 'at work'. Playground and sporting injuries must be recorded by the School via the standard accident reporting procedures.
- 3.5 Accidents that occur to pupils off site must be recorded in the same way, although the School's medical staff is unlikely to treat the pupil. All completed forms are to be forwarded without delay to the Director of Operations.
- 3.6 The School should have a record of all accidents in order to provide insurance cover to the injured party and, where applicable, to the member of the staff acting 'in loco parentis'.

3.7 Notification to the Health and Safety Executive

- 3.7.1 Under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) 2013 the School must notify the Health and Safety Executive as soon as possible by completing an online form at <http://www.hse.gov.uk/riddor/report.htm>.
- 3.7.2 The nominated reporting officer for St Paul's School is the Director of Operations. They have the responsibility of notifying the HSE of reportable accidents through the HSE website. If the Director of Operations is unavailable, the Operations and Compliance Manager or Facilities

Manager should be contacted. A Duty Porter is available 24 hours a day via the Main Reception on the School telephone number (020 8748 9162).

- 3.7.3 An electronic record is kept of any RIDDOR incidents and full guidance notes can be found [here](#).

3.8 Record Keeping

- 3.8.1 The School keeps records, for at least three years, of:
- any reportable death, specified injury, disease or dangerous occurrence that requires reporting under RIDDOR;
 - all occupational injuries where a worker is away from work or incapacitated for more than three consecutive days.
- 3.8.2 From 6 April 2012, the School has not been required to report over-three-day injuries, just keep a record of them. Over-seven-day injuries must be reported to the HSE.

3.9 Different Reporting Requirements

Injuries and Ill Health to People at Work

- 3.9.1 The Director of Operations will report the following work-related accidents¹, including those caused by physical violence, if an employee is injured, wherever they are working:
- accidents which result in death or a specified injury must be reported without delay (see 'Reportable specified injuries');
 - accidents which prevent the injured person from continuing their normal work for more than seven days (not counting the day of the accident, but including weekends and other rest days) must be reported within 15 days of the accident.
- 3.9.2 The Director of Operations will also report any case of a work-related disease, specified under RIDDOR, that affects an employee and that a doctor confirms in writing. The School is also required to report any work-related deaths and certain injuries to self-employed people that take place while they are working at the premises.
- 3.9.3 Reportable specified injuries include:
- fractures, other than to fingers, thumbs and toes;
 - amputations;
 - any injury likely to lead to permanent loss of sight or reduction in sight;
 - any crush injury to the head or torso causing damage to the brain or internal organs;
 - serious burns (including scalding), which: cover more than 10% of the body; or
 - 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;

¹ In relation to RIDDOR, an accident is a type of incident which is separate, identifiable, unintended and which causes physical injury. Stress-related conditions usually result from a prolonged period of pressure, often from many factors, not just one distinct event.

- any other injury arising from working in an enclosed space which: leads to hypothermia or heat
- induced illness; or
- requires resuscitation or admittance to hospital for more than 24 hours.

3.9.4 Reportable specified diseases include:

The following are reportable, if they arise 'out of or in connection with work':

- the death of any person, whether or not they are at work;
- accidents which result in an employee or a self-employed person dying, suffering a specified injury, being absent from work or unable to do their normal duties for more than seven days;
- accidents which result in a person not at work (e.g. a patient, service user, visitor) suffering an injury and being taken directly to a hospital for treatment, or if the accident happens at a hospital, if they suffer a specified injury;
- an employee or self-employed person has one of the specified occupational diseases or is exposed to carcinogens, mutagens and biological agents;
- specified dangerous occurrences, which may not result in a reportable injury, but have the potential to do significant harm.

Physical Violence

- 3.9.5 Some acts of non-consensual physical violence to a person at work, which result in death, a specified injury or a person being incapacitated for over seven days, are reportable. In the case of an over-seven-day injury, the incapacity must arise from a physical injury, not a psychological reaction to the act of violence. Examples of reportable injuries from violence include an incident where a teacher sustains a specified injury because a pupil, colleague or member of the public assaults them while on School premises. This is reportable, because it arises out of or in connection with work.

Reportable Occupational Diseases

- 3.9.6 The School will report occupational diseases when they receive a written diagnosis from a doctor that their employee has a reportable disease linked to occupational exposure. (See www.hse.gov.uk/riddor for details of the reporting arrangements for self-employed people.)

These include:

- carpal tunnel syndrome;
- severe cramp of the hand or forearm;
- occupational dermatitis, eg from work involving strong acids or alkalis, including domestic bleach;
- hand-arm vibration syndrome;
- occupational asthma, eg from wood dust and soldering using rosin flux;
- tendonitis or tenosynovitis of the hand or forearm;
- any occupational cancer;
- any disease attributed to an occupational exposure to a biological agent.

3.10 Incidents to Pupils and Other People who are not at Work

3.10.1 Injuries to pupils and visitors who are involved in an accident at School or on an activity organised by the School are only reportable under RIDDOR if the accident results in:

- the death of the person, and arose out of or in connection with a work activity; or
- an injury that arose out of or in connection with a work activity **and** the person is taken directly from the scene of the accident to hospital for treatment (examinations and diagnostic tests do not constitute treatment).

3.10.2 The lists of specified injuries and diseases described in the above section only apply to employees. If a pupil injured in an incident remains at School, is taken home or is simply absent from School for a number of days, the incident is **not reportable**. The Director of Operations will consider whether the incident was caused by:

- a failure in the way a work activity was organised (eg inadequate supervision of a field trip);
- the way equipment or substances were used (e.g. lifts, machinery, experiments etc); and/or
- the condition of the premises (e.g. poorly maintained or slippery floors).

3.10.3 Not all sports injuries to pupils are reportable under RIDDOR, as organised sports activities can lead to sports injuries that are not connected with how Schools manage the risks from the activity.

3.10.4 The essential test is whether the accident was caused by the condition, design or maintenance of the premises or equipment, or because of inadequate arrangements for supervision of an activity.

3.11 Dangerous Occurrences

3.11.1 These are specified near-miss events, which are only reportable if listed under RIDDOR.

3.11.2 Reportable dangerous occurrences in Schools typically include:

- the collapse or failure of load-bearing parts of lifts and lifting equipment;
- the accidental release of a biological agent likely to cause severe human illness;
- the accidental release or escape of any substance that may cause a serious injury or damage to health;
- an electrical short circuit or overload causing a fire or explosion.

3.12 Slips and Trips

3.12.1 The Health and Safety at Work etc Act 1974 (HSW Act) requires employers to ensure the health and safety of all employees and anyone who may be affected by their work, so far as is reasonably practicable. This includes taking steps to control slip and trip risks. Employees have a duty not to put themselves or others in danger, and must use any safety equipment provided. The Management of Health and Safety at Work Regulations 1999 require employers to assess risks (including slip and trip risks) and, where necessary, take action to address them. The Workplace (Health, Safety and Welfare) Regulations 1992 require floors to be suitable, in good condition and free from obstructions. People should be able to move around safely.

3.12.2 The School takes the following steps to prevent slips and trips:

- The use of entrance matting
- Prompt repairs to leaks from machinery or buildings, and plant and equipment maintained
- Pedestrian and vehicle routes planned to avoid contaminated areas, where applicable
- Ensuring that the cleaning contractors use correct cleaning methods and materials, leaving floors dry or excluding pedestrians until floors are dry
- Ensuring that the cleaning contractors have effective arrangements in place for dealing with spills
- Regular inspections by the cleaning contractors and Estates team to check for loose, damaged and worn flooring and prompt repairs/replacements as needed
- Floors which are likely to get wet or have frequent spillages are of a type that does not become unduly slippery
- Ensuring lighting is sufficient and that slopes and steps are clearly visible, with walkways clear of obstructions

3.13 Notification

3.13.1 Details of serious incidents will (where it has not already been done) automatically be passed on to the following staff by the Security Manager, Head Porter or the Duty Porter:

- High Master and/or Head
- Director of Operations
- Surmaster and/or Deputy Head
- Housemaster or Tutor
- Parents (where possible notification will be by a member of the medical or teaching Staff)
- Chair of the Health & Safety Committee (if applicable – currently the Director of Operations)
- Head of department (if applicable)
- The School's Insurance Company (if appropriate)

3.14 Investigation

3.14.1 As soon as reasonably practical after a reportable incident has occurred, the Chair of the Health & Safety Committee will report to the High Master, Director of Operations and the Head/Surmaster, as appropriate.

3.14.2 Where required, the Chair of the Health and Safety Committee will investigate the accident or incident, but this may be designated to another member of the committee. Such investigation 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 in relation to litigation which is current or in prospect.

3.14.3 Where appropriate, the School will seek legal advice from the School's solicitors before commencing an internal investigation.

3.14.4 If an investigation is required this should precede the submission of Form F2508 to the HSE, where possible.

3.14.5 The outcome of the investigation will be reported to the next appropriate Health and Safety Committee.

4 Statutory Notices

4.1 “Health and Safety Law” posters are displayed in the following locations:

- Reprographics
- Groundsmen’s Tea Room (East Pavilion)
- Outside Medical Centre
- SPS Staff Room
- Ichthys Staff Room
- Estates Workshop
- Wathen Hall
- Drama Centre

4.2 A current Certificate of Employer’s Liability Insurance is displayed in the Main Reception the St Paul’s and St Paul’s Juniors Staff Rooms.

5 Health and Safety Inspections

5.1 In addition to user vigilance, competent persons must service, test, inspect, examine, maintain or assess the following as necessary at appropriate intervals (and at least in accordance with the requirements set out below). Clear records of all activities/certificates must be retained for future reference.

5.2 NB: A detailed property assets register is invaluable.

- Gas fired boilers and appliances – service annually
(NB: Landlord certificates must be obtained for domestic premises)
- Radioactive sealed sources – wipe test every 24 months
- Electrical installations – inspect and test usually every five years
- Portable electrical appliances – inspect and test, often annually but risk assess
- Fire alarm systems, including automatic fire detectors and electromagnetic door releases etc. are tested every six months and serviced every four months. Emergency lighting is tested (and serviced) annually
NB: both may include batteries and battery charging systems
- Emergency light units – indicatory lights inspect weekly, functional test monthly
- Fire extinguishers and other emergency firefighting equipment – service annually
- Fire safety and fire exit routes – formally inspect once per term
- Fume cupboards and any other local exhaust ventilation (LEV) equipment –thoroughly examine every 14 months
- Lifts, lifting gear, lifting equipment, hoists – thoroughly examine every six months and service regularly
- Eyebolts, mansafety and latchway systems – test/service annually
- Retractable audience seating – service annually
- Trees – inspect regularly in accordance with professional’s recommendations
- Swimming pool rescue equipment - inspect weekly
- Swimming pool water quality – test regularly depending on bather load
- Safety devices attached to compressed gas containers – inspect termly

- Fixed and portable pressure systems including bulk gas storage facilities – examine in accordance with written scheme
- Emergency stop buttons – test termly
- Gymnasium equipment and play equipment – inspect annually
- Fitness machines – inspect regularly according to use
- Kitchen extract systems – cleaned annually
- Access equipment including scaffold towers and ladders/step ladders – inspect every six months
- Guards, safeguards and safety devices fitted to work equipment, including machines – inspect at least termly – service at least annually
- Water systems (legionella control) - test in accordance with the L8 compliant risk assessment
- Premises, building, fabric asbestos, fixtures and fittings, particularly to include items to reduce risk of falling - inspect annually or in accordance with risk assessment
- Lightning protection – test every 11 months.

5.3 Other regular actions required:

- Practice fire drills are held termly
- Health and Safety Policy is reviewed annually
- Health and Safety Training refresher course is sent out annually and the results reported to the Health and Safety Committee
- Risk assessments should be reviewed annually or when there has been significant change such as to personnel or procedure; however, where a professional risk assessment has been commissioned it is often not necessary to re-engage the professional on a regular basis. If the professional is re-engaged a review does not necessarily mean a repeat assessment.
- Records of accidents are reported termly at the Health and Safety Committee
- (Departmental) safety codes should be reviewed annually
- Critical Incident Plan is reviewed annually
- Legionella risk assessment should be reviewed biennially

6 Health Infections

6.1 St Paul's School follows guidance published by the UK Health Security Agency when dealing with health infections and applies proportionate control measures to reduce the spread of infections including;

- Regular handwashing with warm water and liquid soap or antibacterial gel
- Adoption of the 'Catch it, bin it, kill it' approach to reduce the spread of airborne infection
- Use of appropriate personal protective equipment including disposable medical gloves, aprons, goggles and face masks where appropriate
- Thorough specialist cleaning provided by the School's Cleaning Contractor
- Immediate cleaning up of blood and other bodily fluids using medical procedures
- Regular laundering of used linen by the contracted cleaning company
- Segregation and separate specialist disposal of clinical waste
- Adopting recommended exclusion periods for infectious diseases.

- 6.2 The School's Critical Incident Plan and Infection Control Policy details procedures to deal with an infectious disease outbreak
- 6.3 The School actively encourages staff and pupils to follow good hygiene practice

7 Kitchen and Food Hygiene

- 7.1 The School employs contract caterers but remains responsible for the kitchen premises and equipment.
- 7.2 All work surfaces, shelves, floors and walls should be in good condition and easy to clean.
- 7.3 There are comprehensive food hygiene regulations which amongst other things cover the keeping of food stuffs at certain temperatures (both hot and cold). Equipment designed to keep the food at the required temperatures will be provided and maintained to a suitable standard.
- 7.4 The contract caterers are audited annually by ISCC and the results are communicated to the School.

8 Allergies

- 8.1 Please see separate policy [Managing Allergies and Anaphylaxis](#)

9 Visitors

- 9.1 Further details on this are on the intranet under the [Security, Access Control, Workplace Safety and Lone Working Policy](#). A thorough attempt has been made throughout this policy document to identify all specific areas of risk in School work and the measures needed to control the risks to employees, pupils and other persons affected by our working activities. In relation to visitors, who may be contractors, to the School premises, sufficient risk assessments to enable such persons to remain safe whilst on School property must be carried out in accordance with the requirements of both this School policy and the law.
- 9.2 In many cases, visitors will need to be given basic information on, for example, the layout of the School. Signs are maintained in the car park and at the entrance gates to indicate the whereabouts of reception etc. Visitors who will be spending time on the premises unaccompanied by a member of staff should be supplied with emergency evacuation instructions.
- 9.3 A "visitors' book", operated through Vis-IT ED, is maintained in the Main Reception. Visitors are required to sign 'in' and 'out' of the premises.

C2: Premises Arrangements

10 Premises

10.1 The Workplace Health, Safety and Welfare Regulations concerns basic workplace conditions. These Regulations should be observed and cover, amongst other things, the following:

- Ventilation – workplaces should be sufficiently well ventilated with air which is, as far as possible, free of impurity
- Temperature – should normally be at least 16 degrees Celsius or 13 degrees for strenuous work. If experiencing, difficulty, employees should contact the Head of Estates.
- Lighting – should be sufficient to enable people to work without risks to health and safety. Outdoor traffic routes used by pedestrians are lit after dark and if experiencing, difficulty, employees should contact the Head of Estates
- Cleanliness - floors and indoor traffic routes should be cleaned at least once per week
- Room Dimensions and Space – a minimum work space of 11 cubic metres per person is specified, but this does not apply to rooms used for classes and meetings
- Workstations and Seating – should be safe and comfortable. The requirements for users of display screens are covered separately, though pupils are unlikely to use VDU's sufficiently to be covered by regulations
- Conditions of Floors and Traffic Routes – these should be kept in a safe condition and be non-slip, particularly in 'wet areas'. Traffic routes must be kept free of obstructions which may present a hazard or impede access
- Provision of Fencing – this is required at any place where a person might fall from any height likely to cause an injury, e.g. from a window
- Maintenance of the Workplace and Equipment, Devices and Systems – there is a statutory requirement to maintain such in an efficient state, in efficient working order and in good repair. This means ensuring regular checking, or where appropriate, that maintenance contracts have been placed.
- Gas shut-off valves and electric isolation switches are easily identifiable on the incoming mains in laboratories, in the Technology Centre, for the main kitchen and for the boiler rooms.
- A high standard of housekeeping should be maintained throughout the School premises with access to appropriate waste containers.
- Low Level Glazing in Windows and Doors – needs to be safety glass (e.g. laminated or toughened) or protected in an appropriate way. All new low-level glazing and repairs to existing glazing must meet Building Regulations and BS 6206.
- Windows - need to be cleaned safely. Copies of contractors' safety policies should be examined. Suitable additional safety provisions will be required in certain circumstances, e.g. harness anchorages.
- Sanitary Provisions – the legislation lays down the minimum number of sanitary conveniences to be provided for people at work, e.g. for 6 - 25 employees - 2 water closets and 2 hand wash basins; for 26 - 50 employees - 3 water closets and 2 hand wash basins. This regulation does not apply to the pupils as they are not covered by the legislation. Soap and hand towels or hand dryers should also be provided.
- Facilities – the regulations require that accommodation for employees' clothing is provided and that facilities for rest and eating meals should be provided.

- The School complies with the Smoke Free (Premises and Enforcement) Regulations.
- Access to drinking water is available throughout the School.

11 Fire Risk Assessment

- 11.1 Precautions to prevent injury in case of fire must be adequate in the circumstances in accordance with our risk assessments. The following fire control activities supplement the precautions and receive the special attention of the Fire Officer. The Director of Operations, who is the Head Fire Marshal for St Paul's Juniors and St Paul's School, with the assistance and delegation to the Head of Estates, is responsible for ensuring that the following fire controls are in place:
- 11.2 Fire exit routes must be kept freely accessible and be kept clear of obstructions. Fire doors should never be propped open. If fire doors need to be regularly kept open for any reason, they should be fitted with magnetic catches releasable by the activation of the fire alarm.
- 11.3 Final fire exit doors must always be open or be openable without a key during times when the premises are occupied. These doors should be fitted, wherever practicable, with appropriate door furniture.
- 11.4 Final fire exit doors and fire doors should be identified. Fire exit route directional signs should be posted in all corridors and communication spaces.
- 11.5 Fire evacuation instructions should be displayed in every classroom, every other room which is occupied on a regular basis and in other areas as appropriate. For example, common room areas and Reception.
- 11.6 There should be adequate provision of fire extinguishers and other firefighting equipment within areas identified as being of high vulnerability to accidental fire occurrences. These should be inspected and tested annually.
- 11.7 Fire extinguishers should never be obstructed and, where practicable, should be held on brackets attached to permanent structures. The top of the fire extinguisher should be approximately one metre from the ground.
- 11.8 Key personnel in departments with firefighting equipment should receive fire procedures training and instruction on the use of fire extinguishers. Fire procedures training should include recommendations on the isolation of gas and electric services and instructions on calling the emergency services.
- 11.9 There are termly practice evacuations of buildings: including the boarding houses (during boarding time), which are recorded in the Fire Log.
- 11.10 Fire alarms, emergency lights and firefighting equipment is maintained, inspected and tested. Records of weekly testing of fire alarms, annual full discharge test of emergency lighting and annual testing of firefighting equipment is kept in the Head of Estates' office.
- 11.11 The control of activities related to fire is recorded in a separate series of documentation. This documentation comprises the following:

- **The Fire Safety Policy and Fire Safety Procedures** are produced by the Director of Operations. The St Paul's Juniors Fire Safety Policy and Fire Safety Procedures have been modified by the Head, in consultation with the Director of Operations.
- **The School House Fire Procedures** are produced by the Housemaster of the School House in consultation with the Director of Operations.
- **Fire Risk Assessments** and records of testing of the fire equipment are maintained by the Head of Estates
- **The School Premises Licence**, enabling public performances in the Wathen Hall, the Drama Centre and other locations on the School site, is reviewed by the Director of Operations in conjunction with the Head of SPJ, the Music School Manager and Theatre Technical Manager.

12 Electricity at Work Regulations

12.1 The Regulations

12.1.1 The School recognises these Regulations as set out in the Electricity at Work Regulations 1989 and undertakes to comply with them in all respects. The Regulations cover the following:

Regulation	Duty
Regulation 4	
All electrical systems shall be constructed and maintained to prevent danger.	Reasonably practicable
All work activities are to be carried out so as not to give rise to danger.	Reasonably practicable
Regulation 5	
No electrical equipment is to be used where its strength and capability may be exceeded so as to give rise to danger.	Absolute
Regulation 6	
Electrical equipment sited in adverse or hazardous environments must be suitable for the conditions.	Reasonably practicable
Regulation 7	
Live conductors should be permanently safeguarded or suitably positioned.	Reasonably practicable
Regulation 8	
Equipment must be earthed or other suitable precautions must be taken, e.g. the fitting of residual current devices, double-insulated equipment, reduced-voltage equipment, etc.	Absolute
Regulation 9	
Nothing is to be placed in an earthed circuit conductor which might, without suitable precautions, give rise to danger by breaking the electrical continuity or introducing a high impedance unless precautions are taken to prevent danger.	Absolute
Regulation 10	
Every joint and connection in a system must be mechanically and electrically suitable for use.	Absolute
Regulation 11	
Efficient means should be installed in each system to prevent excess current which would result in danger.	Absolute
Regulation 12	

Where necessary to prevent danger, suitable means shall be available for cutting off the electrical supply to any electrical equipment. (This includes, where appropriate, methods of identifying circuits).	Absolute
Regulation 13	
Adequate precautions must be taken to prevent electrical equipment, which has been made dead in order to prevent danger, from becoming live whilst any work is carried out.	Absolute
Regulation 14	
No work can be carried out on live electrical equipment unless this can be properly justified. If such work is carried out, suitable precautions should be taken to prevent injury.	Absolute
Regulation 15	
Adequate working space, adequate means of access, and adequate lighting shall be provided for all electrical equipment on which or near which work is being done in circumstances that may give rise to danger.	Absolute
Regulation 16	
No person shall engage in work that requires technical knowledge or experience to prevent danger or injury, unless he has that knowledge or experience, or is under appropriate supervision.	Absolute

12.2 Internal Requirements

12.2.1 'As installed' drawings of the fixed installation should be available and modified as and when necessary. Routine inspections and tests of all wiring and fixed electrical installations should be carried out and records of the test results should be obtained and kept.

12.2.2 Temporary systems, for example, stage lighting and its control gear, should be inspected and tested after initial set up and frequently thereafter.

12.3 Portable Appliance Testing Policy (PAT)

Guidance on the Procedures for Inspecting and Testing Portable Electrical Equipment

12.3.1 Portable Electrical Equipment is defined as equipment that is powered by being plugged into the electrical mains supply. The Facilities Manager is responsible for organising the periodic inspecting and testing of all Portable Electrical Equipment under their control in liaison with Estates, Academic and Services departments. The Science and Drama departments arrange PAT testing of their equipment and provide the reports to the Facilities Manager.

12.4 HSE Guidance

12.4.1 The legal requirement relating specifically to use and maintenance of electrical equipment are contained in the Electricity at work act 1989. These regulations apply to all work activities involving electrical equipment. They are in place for the duty holder: Maintaining portable electrical equipment HSG107 (third addition)

12.4.2 The regulations do not specify what needs to be done, by whom or how frequently (for example, they do not make it a legal requirement to test all portable electrical appliances every year). This allows the duty holder to select precautions appropriate to the risk rather than having precautions imposed that may not be relevant to a particular work activity: Maintaining portable electrical equipment HSG107 (third edition)

12.5 Arrangements for PAT to be Carried Out

12.1 The Director of Operations and Facilities Manager ensure that the Services department carries out this work and the Facilities Manager maintains a register of all equipment tested. To arrange testing, contact should be made with the Facilities Manager who will ask for a full list of equipment to be tested. The Services engineer will liaise with the department contact to arrange a suitable time for the testing to be carried out. On completion of the testing a report will be provided with recommendations for any remedial action required.

13 Pressure Vessels and Associated Equipment

13.1 Pressure Systems Safety Regulations apply to compressed air and steam systems, including steam plant found in kitchens and air receivers used in Technology. The School recognises the importance of the Regulations which contain the following requirements:

- Safe operating limits of pressure equipment and plant must be established
- Suitable written schemes should be drawn up for the periodic examination of pressure vessels, safety devices associated with them and any associated potentially dangerous pipe work
- Written schemes must be certified by a competent person and the examinations must be carried out by a competent person at intervals set down within the scheme. Usually the competent persons will be the engineers employed by the School's insurer
- Records must be kept of examinations and tests
- Adequate operating and emergency instructions should be provided
- Proper maintenance must be carried out and recorded

13.2 Internal Arrangements

13.2.1 All regulators, flashback arrestors and other ancillary equipment used in conjunction with compressed gas containers, and the compressed gas containers themselves if School property, should be regularly inspected and maintained. Outside contractors should normally be engaged for this work.

13.2.2 Pressure cookers and small autoclaves used in Biology should be inspected and tested in accordance with the CLEAPSS recommendations and appropriate records must be kept. Records are kept by the Head of Estates.

14 Gas Safety

14.1 Introduction

14.1.1 The Gas Safety (Installation and Use) Regulations 1998 apply to all appliances and installations covered by the Gas Act. The legislation therefore deals with the safe use of gas for heating, lighting, cooking, and other purposes. The requirements cover both natural gas and Liquid Petroleum Gas (LPG) in both bulk and transportable containers and the installation, servicing, maintenance and repair of gas appliances and fittings within the School.

14.1.2 If/where domestic properties are provided for employees or if properties are let by the School, these can also be affected.

14.2 Qualification and Supervision

14.2.1 No person is allowed to work on gas storage vessels or fittings, including appliances, unless they are competent and in membership of a 'class of person' approved by the Health and Safety Executive. This means registered persons. The School will ensure that in-house staff or contractors working on gas fittings are appropriately registered.

14.3 Standards

14.3.1 The Regulations require that installations, materials and workmanship achieve an appropriate standard of safety. Standards will normally be met by using appropriately registered persons.

14.4 Existing Gas Fittings

14.4.1 No alterations to gas storage vessels or fittings can be made which would adversely affect their safety. This is particularly relevant where alterations to premises are being made.

14.4.2 Consideration of gas safety must take place before any alteration work commences and this matter must be included in the risk assessment process.

14.5 Emergency Controls and Notices

14.5.1 An emergency control device should be provided near to where gas is first supplied into the premises and a notice should be posted adjacent to the control describing the procedure to be followed in the event of a gas escape.

14.6 Maintenance

14.6.1 All gas appliance, installation pipe work and flues must be maintained in a safe condition.

14.7 Landlords

14.7.1 If/where the School acts as a 'landlord', it must ensure that gas appliance and flues are maintained in safe condition, that annual safety checks are carried out and that records are kept and issued to tenants. Where mobile and portable appliances are 'landlord' owned, the duties to ensure annual testing rests with the School.

15 Hazardous Substances

15.1 Control of Substances Hazardous to Health (COSHH)

15.1.1 The COSHH Regulations apply to activities where hazardous substances are used and to activities which produce hazardous substances.

15.1.2 Hazardous substances are often used in science, art, pottery, technology, drama workshop, cleaning work, office work, maintenance work and grounds work. Additionally, hazardous substances can be produced by work such as woodworking (dusts) and welding (fumes) and legionella bacteria may reproduce in hot and cold-water systems.

15.1.3 The Regulations require an assessment of the risks to health associated with exposure to hazardous substances before employees and others, including pupils, are exposed. Model written assessments are available for some areas of work, e.g. CLEAPSS Risk Assessments (for Technology) and CLEAPSS Hazards (for Chemistry), and these can be used if they are customised for the particular circumstances found in the School. It is likely that for many hazardous substances, models will not be available and therefore, full risk assessments will have to be prepared by the person responsible for introducing the substance into the School. Consideration must always be given to whether it is practicable to use a non-hazardous or less hazardous substance.

After evaluation of the risks, the Regulations require provision and maintenance of control measures and, if appropriate, monitoring of exposure and health surveillance.

15.2 Hazardous Substances Found in the School Will Often Comprise:

- Substances classified as being very toxic, toxic, harmful, corrosive or irritant – these are commonly labelled with a hazard pictogram
- Substances with a Workplace Exposure Limit (WEL)
- Biological agents
- Dust of any kind when in significant quantities in air
- Substances similar to those above including paint/aerosols

15.3 Action to be Taken

Assessment of Risk to Health

15.3.1 The requirement is to make a suitable and sufficient assessment of the risk created by each hazardous substance or area of work involving hazardous substances and of the steps that need to be taken to control exposure. Assessments will be reviewed annually and when previous assessments are no longer valid for some reason, e.g. after there have been significant changes to the work or information about the substance. A COSHH risk assessment template is available from the [Operations Coordinator](#), who can also provide advice and guidance if needed.

15.3.2 Heads of departments and managers are responsible for ensuring that all the hazardous substances used in their areas of control are identified (inventories should be produced) and assessed. Hazard data sheets are available from the suppliers of the substances and these should be obtained and used as the basis for assessment. WEL's must be identified and considered, as an indicator of the risk.

15.3.4 Assessment MUST consider:

- The risks of exposure to the substances, e.g. in each particular activity, considering the age of pupils, pupils' temperament and understanding, the method of use, the quantities, the dilutions, and the locations involved.
- Risks associated with storage and spills of substances – spill kits will be needed in some areas.

15.3.5 Collection of hazard data, even CLEAPSS data if not clearly 'personalised', or the use of risk assessments not designated for the particular work undertaken is insufficient risk assessment.

15.4 Control of Exposure

15.4.1 It is necessary, as far as possible, to prevent or adequately control exposure to hazardous substances by measures other than personal protective equipment. This means the provision of control measures like Local Exhaust Ventilation (LEV) (e.g. for wood working machines and for brazing processes and fume cupboards for science) and keeping work places scrupulously clean.

15.4.2 Control measures must be well designed, must work effectively and must be properly used.

15.4.3 Where tight fitting Respiratory Protective Equipment (RPE) is provided to supplement any control measure, it must be suitable for the wearer (the fit must be tested) and the likely exposure. Personal protective equipment (PPE) must be 'CE' marked, the wearer must be trained to use the PPE, and it must be properly maintained and stored.

15.5 Maintenance of Control Measures

15.5.1 Control measures and PPE must be well maintained.

15.5.2 Engineered controls must be thoroughly examined, and if appropriate, tested at suitable intervals. Heads of Departments must ensure that these respirators are inspected once per month.

15.5.3 Records of all inspections, examinations and tests will be kept for at least five years.

15.6 Monitoring of Employees' Exposure

15.6.1 Monitoring of exposure is to be carried out when it is necessary to ensure that exposure is being adequately controlled. Records of the monitoring carried out are to be kept for at least 40 years in the case of personal exposures of identifiable employees/pupils and for five years in any other case.

15.7 Health Surveillance

15.7.1 Health surveillance needs to be carried out when, through the circumstance of the exposure to a substance, there is the likelihood of an identifiable disease or effect.

15.7.2 Employees will have reasonable access to their health records which shall be kept in accordance with the School's [Data Retention Policy](#).

15.8 Information, Instruction and Training

15.8.1 Employees and pupils exposed to hazardous substances will be provided with sufficient information, instruction and training for them to understand the nature of any risks created by the exposure and, if required, the precautions which need to be taken and how to use any control measures.

15.9 Conclusions

15.9.1 Carrying out the assessment work is a vital part of compliance with the Regulations and the purpose of carrying out assessments is to ensure that sensible decisions are reached about how to remain healthy alongside hazardous substances. The precautions which are to be taken are determined by the nature and the degree of risk in the circumstances of each case.

15.10 Poisons and Explosive Precursors

15.10.1 Any department wishing to purchase regulated and reportable substances must register a named individual, including photographic identification, with the supplier. This individual is responsible for ensuring that storage of the substance is safe and appropriate within their department. ([Control of Poisons and Explosives Precursors Regulations 2023](#)).

16 Pesticides

16.1.1 There are legal controls on the use of pesticides to safeguard people and the environment. The Plant Protection Products (Sustainable Use) Regulations of 2012 replace previous UK governing legislation on the use of pesticides and are the reference for the following information.

16.1.2 Pesticides are:

- Products used to control or destroy unwanted creatures, plants and other organisms
- Timber treatment products
- Chemicals used for the control of growths on masonry

16.2 Purchase of Pesticides/Chemicals and Limitation on Use

16.2.1 Only pesticides which have been approved and have approval numbers may be advertised, sold or supplied in the United Kingdom. Each product is assigned conditions of use and is assigned to a field of use. The latter limits how the particular pesticide may be used, e.g. in agriculture, in forestry or as a wood preservative.

16.2.2 The product approval number, fields of use and conditions of use are all given on the label. Conditions of use include requirements as to operator protection and must always be observed. Only approved pesticides will be used in the School. Only operators with PA1, PA2 or PA6 are permitted to spray, handle or purchase chemicals.

16.3 Storage of Pesticides

16.3.1 Pesticides on School premises are to be stored and transported safely.

16.3.2 The pesticides store must be large enough to hold the maximum capacity of pesticides likely to be kept at any one time. The store used by the School will meet the following criteria. It should be:

- Suitably sited
- Of adequate capacity and construction
- Designed to hold spillage
- Adequately lit if necessary and ventilated
- Resistant against fire and, if possible, frost
- Designed so that containers can be safely stacked and moved in and out
- Kept locked except when in use

16.4 Storage of Personal Protection and Protective Clothing

16.4.1 This will be stored in a locker separately from other clothing.

16.5 Use of Pesticides

16.5.1 Everyone who uses a pesticide must be competent to do so and the School will provide employees with sufficient instruction and guidance to ensure that products are used safely, efficiently and humanely.

16.5.2 Safe and competent use of pesticides involves a risk assessment of possible problems. Amongst other things which will be considered are:

- Correct protective clothing (in particular, correct types of gloves, overalls and respirators, if required)
- How to avoid spray drift
- The need to warn neighbours and others who may possibly be affected by the proposed application

16.5.3 Application records will be maintained.

16.6 Certificates of Competence

16.6.1 To apply pesticides, the operator must hold a minimum of PA1 and PA6 (for Knapsack applications) and PA2 for Boom Mounted applications. These qualifications are awarded via the NPTC.

16.6.2 Staff members who are not qualified are not permitted to apply pesticides, regardless of age, experience or if supervised.

16.7 Disposal of Pesticides

16.7.1 Users are to avoid building up stocks of leftover pesticides and surplus dilute spray being left; however, some disposal of unwanted pesticides, perhaps in the form of container washing, will often be necessary. These can be disposed of via a competent contractor (the dumping of unwanted pesticides or containers is an offence) and the requirements of the Environmental Protection Act including the “duty of care” must be complied with.

17 Storage of Flammable Liquids and Petrol

17.1.1 The amount of flammable liquids kept in the open in any classroom or working area should be kept as small as is reasonably practicable. Containers, when not in actual use, should be kept, as far as possible, in metal bins or cupboards and vessels containing flammable liquids must be kept closed when not in use. This applies to empty containers as well as full containers.

17.1.2 The fire resisting bins or cupboards provided should be marked, “Flammable Liquids”.

17.1.3 With the exception of purpose-built flammable stores, the total quantity of flammable liquids stored in any one room must not exceed 50 litres.

17.2 Hazardous Material Registers

17.2.1 Registers are kept by the School as follows:

- Asbestos Register – Estates Department

18 Asbestos

- 18.1 Asbestos is a naturally occurring mineral. It can be amphibole asbestos, which included Crocidolite (blue) and amosite (brown) asbestos or serpentine asbestos, which is Chrysotile (white) asbestos. These are the three most commonly used types of asbestos in the UK. Since the mid 1980's asbestos has been slowly phased out of building materials before its total ban in 1999. The most likely location to find asbestos containing products in 1990 buildings would be in the heating systems, e.g. gaskets, jointing materials and perhaps asbestos cement products.
- 18.2 The [Control of Asbestos Regulations 2012. Approved Code of Practice and Guidance is the current legislation on asbestos.](#)
- 18.3 The ACOP provides advice on the duties under Regulation 4 of the Asbestos Regulations to manage the risk from asbestos in non-domestic premises. It explains the duties of building owners, tenants and any other parties who have a legal responsibility of the premises. It also sets out what is required of people who have a duty to co-operate with the main duty holder to enable them to comply with the regulations.
- 18.4 Regulation 4 of the ACOP requires duty holders to:
- (a) Take reasonable steps to find materials in premises likely to contain and check their condition.
 - (b) Presume that materials contain asbestos unless there is strong evidence to suppose they do not.
 - (c) Make a written record of the location and condition of asbestos and presumed ACM's and keep the records up-to-date.
 - (d) Assess the risk of anyone being exposed to these materials.
 - (e) Prepare a plan to manage that risk and put into effect to ensure that:
 - i. Any materials known or presumed to contain asbestos are kept in a good state of repair;
 - ii. Any material that contains or is presumed to contain asbestos is, because of the risk associated with the location, repaired or if necessary, removed and;
 - iii. Information on the location and condition of the material is given to anyone potentially at risk
- 18.5 It is the School's policy not to remove known asbestos unless 'work' is to be undertaken and where there is a risk to the work force of airborne asbestos fibres being released. Asbestos removal work will only be undertaken by a licensed Asbestos Removal contractor.
- 18.6 It is the School's policy to ensure that all the known asbestos is kept in a sealed and stable condition and monitored and managed on a regular basis. The most vulnerable asbestos will be inspected at least once every two to three months and the remainder inspected annually. The Asbestos Register will be updated accordingly.
- 18.7 It is the responsibility of the Head of Estates to ensure that the correct line of communication and the procedures continue to be maintained. In the absence of the Head of Estates, the next line of communication is the Estates Coordinator.

- 18.8 It is the responsibility of the maintenance staff to report back to the Head of Estates any accidental damage noted during their time on site. In the absence of the Head of Estates, the next line of communication is the Director of Operations.
- 18.9 The School has an Asbestos Management Plan and Standard Operating Procedures for dealing with Asbestos within the School which is used to clearly identify lines of communication and procedure regarding asbestos within buildings.

19 Work Equipment

Reference: [Provision and Use of Work Equipment Regulations 1998](#).

- 19.1 All dangerous parts of equipment, which includes machinery, must be adequately safeguarded. A machinery inventory has been drawn up to identify equipment and machines with dangerous parts and the associated safeguards. Regular inspections and tests of safeguards and emergency stop devices are carried out and recorded and Risk Assessments reviewed annually.

19.2 Provision and Use of Work Equipment Regulations

- 19.2.1 "Work equipment" includes items such as milling machines, wood-working machinery, air compressors, lawn mowers, overhead projectors, ladders, laboratory apparatuses, portable drills, soldering irons, catering equipment etc. "Work equipment" covers any equipment provided by employees themselves for use at work.

- 19.2.2 The main requirements are to:

- Consider the working conditions and hazards in the workplace when assessing and selecting the equipment.
- Ensure that equipment is suitable for the job it has to do.
- Ensure that equipment is used only for operations for which, and under conditions for which, it is suitable.
- Ensure that equipment is maintained in an efficient state, in an efficient working order and in good repair.
- Give adequate information, instruction and training to users.
- Provide that equipment new to the workplace conforms with the relevant EC product safety directives.

- 19.2.3 The Regulations also contain specific requirements for equipment. There must be:

- Protection against dangerous parts of the machinery.
- Protection against specified hazards, e.g. falling and ejecting articles and substances, ruptures or disintegration of work equipment parts, equipment catching fire or overheating, unintentional or premature discharge of articles and substances, explosions.
- Protection on parts and substances at high or very low temperatures.
- Control systems and control devices.
- A means of isolation on equipment.
- Good lighting, maintenance operations and warnings markings.

19.2.4 Those in control of work equipment will need to assess the risks posed by the use of their present work equipment.

19.2.5 New equipment must comply, if possible, with an appropriate British or CEN Standard and safe operating procedures must be obtained to ensure that the equipment can be used safely.

20 Safety Signs

20.1 The Health and Safety (Signs and Signals) Regulations lay down certain requirements for safety signing including requirements for pictograms and for colour:

- Prohibitory signs are round with a black pictogram on a white background, red edging and a diagonal line
- Warning signs are triangular with a black pictogram on a yellow background
- Mandatory signs are round with a white pictogram on a blue background
- Emergency escape and first aid signs are rectangular or square with a white pictogram on a green background
- Firefighting signs are rectangular or square with a white pictogram on a red background

20.2 All new signs erected adhere to the recognised colour scheme.

21 Noise Control

21.1.1 The Control of Noise at Work Regulations 2005 identify the following exposure limit values and action values.

- The lower exposure action values are:
 - A daily or weekly personal noise exposure of 80dB (A-weighted) and a peak sound pressure of 135 dB (C-weighted)
- The upper exposure action values are:
 - A daily or weekly personal noise exposure of 85 dB (A-weighted) and a peak sound pressure of 137 dB (C-weighted)
- The exposure limit values are:
 - A daily or weekly personal noise exposure of 87 dB (A-weighted) and a peak sound pressure of 140 dB (C-weighted)

21.1.2 Where the exposure of an employee to noise varies markedly from day to day, an employer may use weekly personal noise exposure in place of daily personal noise exposure for the purpose of compliance with these Regulations.

21.1.3 In applying the exposure limit values, but not in applying the lower and upper exposure action values, account shall be taken of the protection given to the employee by any personal hearing protectors provided by the employer.

21.1.4 A risk assessment must be carried out if any employee is likely to be exposed to noise at or above the lower exposure action values. A person's daily noise exposure depends on both noise level and length of exposure.

21.1.5 If the workplace is intrinsically noisy, e.g. it is significantly noisier than one would expect from the sounds of everyday life, it is possible that the noise levels will exceed 80dB. This is comparable to the noise level of a busy street, a typical vacuum cleaner or a crowded restaurant – you will be able to hold a conversation, but the noise will be intrusive. Working in an environment of 80dB for eight hours will result in exposure at the lower exposure action value.

21.1.6 To get a rough estimate of whether a risk assessment is required – see table below.

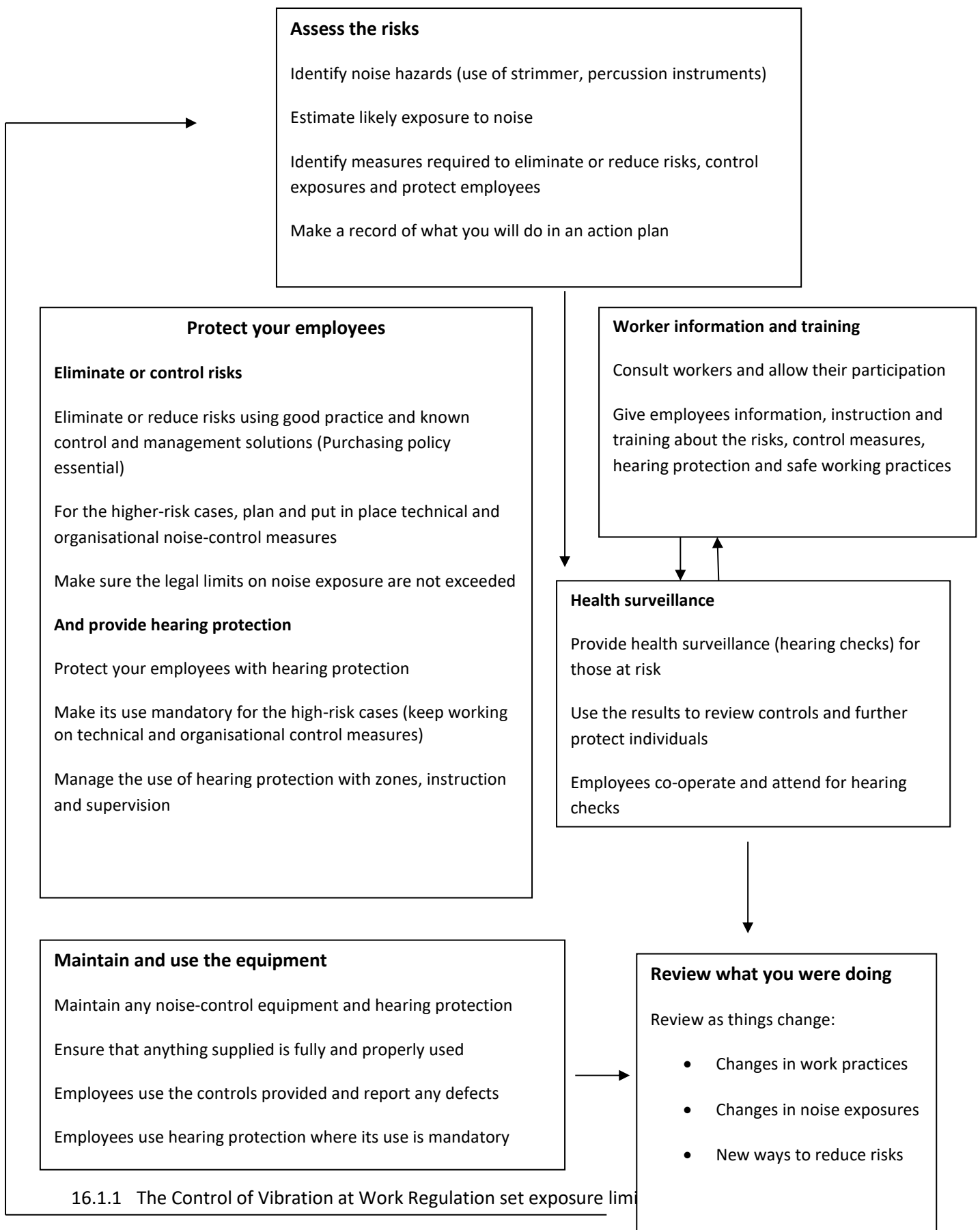
Test	Probable Noise Level	A risk assessment will be needed if the noise is like this for more than:
The noise is intrusive but normal conversation is possible	80 dB	6 hours
You have to shout to talk to someone 2 m away	85 dB	2 hours
You have to shout to talk to someone 1 m away	90 dB	45 minutes

21.2 Purchasing Policy

21.2.1 The emission of noise must be taken into consideration when purchasing and hiring equipment.

21.3 Managing Noise Risks

Obtain “Controlling Noise at Work” guidance on Regulations



- For hand-arm vibration, the daily exposure limit value is 5 m/s² A(8) (ELV) and the daily exposure action value is 2.5 m/s² A(8) (EAV)
- For whole-body vibration, the daily exposure limit value is 1.15 m/s² A(8) and the daily exposure action value is 0.5 m/s² A(8)
- Employers must ensure that employees are not exposed to vibration above an exposure limit value
- If an exposure limit value is exceeded, employers must, a) reduce exposure to vibration to below the limit value, b) identify the reason for that limit being exceeded, and c) modify the measures taken to prevent it being exceeded again

21.1.2 These requirements, however, are subject to the following. They apply from 6 July 2010, where work equipment is used which, a) was first provided to employees prior to 6 July 2007 by any employer, and b) does not permit compliance with ELV, but in using such equipment the employer takes into account the latest technical advances and organizational measures viz – where it is not reasonably practicable to eliminate risk at source and an ELV is likely to be reached or exceeded, the employer must reduce exposure to as low a level as is reasonably practicable by establishing and implementing a programme of organisational and technical measures which is appropriate to the activity.

21.1.3 It is interesting to note that the regulations apply to self-employed persons as they apply to an employer and an employee as if that self-employed person were both an employer and an employee.

21.2 Health Surveillance

21.2.1 Where risk assessment indicates that there is a risk to the health of employees who are, or are liable to be, exposed to vibration or employees are likely to be exposed to vibration at or above an exposure action value, the employer must ensure that such employees are placed under suitable health surveillance. The health surveillance should be appropriate and intended to prevent or diagnose any health effect linked with exposure to vibration where the exposure of the employee to vibration is such that, a) a link can be established between the exposure and an identifiable disease or adverse health effect, b) it is probable that the disease or effect may occur under the particular conditions of work and, c) there are valid techniques for detecting the disease or effect. The employer shall also ensure that a health record is made and maintained and that the record or copy is kept available in a suitable form.

21.3 Information and Training

21.3.1 Where, a) risk assessment indicates that there is a risk to the health of employees who are, or who are liable to be, exposed to vibration or, b) employees are likely to be exposed to vibration at or above the exposure action value, the employer must provide employees with suitable and sufficient information, instruction and training on:

- The organisational and technical measures taken
- The exposure limits and values as well as action values
- The significant findings of the risk assessment, including any measurements taken, with an explanation of those findings

- Why and how to detect and report signs of injury
- Entitlement to appropriate health surveillance and its purposes

21.4 Purchasing Policy

21.4.1 The emission of vibration must be taken into consideration when purchasing and hiring equipment.

22 Lifting Operations and Lifting Equipment

22.1 Proof load test certificates must be available for all lifting equipment including lifts. Lifting equipment and lifts must be regularly maintained and thoroughly examined by competent person(s) and records of these examinations must be kept.

22.2 Currently the Schools' insurers inspect lifting equipment and lifts, and records of these are kept by the Head of Estates.

22.3 The School must ensure that every lifting operation involving lifting equipment is properly planned by a competent person, appropriately supervised and carried out in a safe manner by a competent person.

22.4 Where lifting equipment is used for lifting persons, it must be designed to prevent any persons using it being crushed, trapped, struck or falling from the carrier and so that any person trapped in the carrier is not exposed to danger and can be freed. Schools must ensure that there are adequate emergency warning devices in passenger lifts and that procedures exist to facilitate rescue by competent persons.

23 Personal Protective Equipment (PPE)

23.1 Personal Protective Equipment (PPE) at Work Regulations

23.1.1 PPE is defined in the Regulations as:

"all equipment (including clothing affording protection against the weather), which is intended to be worn or held by a person at work and which protects him against one or more risk to his health or safety"

23.1.2 Examples are safety helmets, face masks, lifejackets, high visibility clothing, safety boots, goggles, harnesses, gloves, clothing against extremes of temperature or wetness etc.

23.1.3 The School will:

- Provide PPE to employees (free of charge) and to pupils whenever health and safety risks are not adequately controlled by other means.
- Select PPE suitable for the risks, the employee, the pupils and the work environment.
- Assess the PPE available to ensure it is suitable.
- Maintain the PPE and provide suitable accommodation for it.

- Ensure that the PPE is properly used through training (theoretical and practical) information and instruction.
- 23.1.4 PPE covers items such as eye protection, head protection, foot protection, hand, leg and arm protection and protective clothing for the body and respiratory protection.
- 23.1.5 All competent PPE suppliers should be chosen who are willing and able to advise on individual requirements. Manufacturers and suppliers have a legal duty to provide information of this type.
- 23.1.6 Maintenance of PPE can include cleaning, disinfection, examination, replacement, repair and testing. The individual(s) responsible for maintenance should be identified. Procedures to be followed and their frequency should be laid down in writing.
- 23.1.7 The School needs to ensure that accommodation for PPE is provided so that it can be safely stored when it is not in use.
- 23.1.8 A systematic approach to training should be taken. Training records should be kept. Users of PPE need to know:
- The risk(s) against which the PPE protects
 - How to use the PPE
 - The way in which the PPE is to be maintained and stored – a practical approach to this element will often be necessary
- 23.1.9 Employees have duties to use PPE in accordance with the training instructions, to take reasonable care of PPE and to report any loss or obvious defect in the PPE.

23.2 Protective Clothing

- 23.2.1 Where appropriate, overalls to protect clothing and bare arms should be worn by employees, pupils and others in laboratories, rooms used for Technology and practical subjects, and during cleaning, maintenance and grounds work.
- 23.2.2 Maintenance Operatives and Cleaners should be provided with overalls of sufficient coverage to protect against dirt, debris and substances. Safety footwear may be required.
- 23.2.3 Grounds/Gardeners, Estates and Services teams should be provided with the following:
- Uniforms consisting of T-shirts, fleece, sweater and waterproof jackets and gloves, eye and ear protection and protective footwear
 - Specific PPE is available for the application of chemicals
- 23.2.4 For some operations with hazardous substances, e.g. use of swimming pool disinfection chemicals, a full set of protective clothing must be available. This should include rubber gloves, goggles, respiratory protection, overalls and rubber boots.
- 23.2.5 Specific risk assessments, including COSHH assessments, must always indicate when personal protection is to be worn and indicates the standard/type of protection necessary.

24 Vehicles on School Property

- 24.1 Speed restriction signs are clearly visible and observed. The Speed Limit in School is 10 mph. Any speeding or erratic driving in School should be immediately reported to the Director of Operations for follow up action, using the [Incident Report Form](#).
- 24.2 Parking areas are clearly marked and only marked spaces may be used unless special arrangements have been made.
- 24.3 The School will ensure that there is adequate segregation of pedestrians and vehicular traffic on the School site.
- 24.4 In particular manoeuvring and reversing should be kept to a minimum. When manoeuvring and reversing vehicles it is essential that drivers, whilst taking the normal care needed for such an operation, keep in mind the fact that pupils are the main users of our premises. Pupils can fail to observe vehicle movements and are themselves often small in stature so being more difficult to observe than most adults. Great care is therefore required when driving on School premises.
- 24.5 Minibus drivers should avoid reversing movements wherever practicable and should obtain lookouts for such manoeuvres where necessary.
- 24.6 Contractors vehicles for construction projects must make use of a banksman.
- 24.7 Coaches used for School transport should be fitted with audible reversing alarms.
- 24.8 Vehicles that are not roadworthy, taxed and insured are not permitted onto the School site.

25 Radon

25.1 Under the Health and Safety at Work etc. Act 1974, employers must, so far as is reasonably practicable, ensure the health and safety of employees and others who have access to their work environment. The Management of Health and Safety at Work Regulations 1999 also requires the assessment of health and safety risks, and this should include radon in the following circumstances:

Above ground - white areas on the map showing less than 1% where no specific action is required other than evidencing the findings. Greater than 1% is classed as a radon-affected area where further action is required.

Below ground – Everywhere in the UK is classed as a radon-affected area, where further action is required. (The definition of below ground is any walls that are in contact with the soil).

Hazard

The School is **not** in an affected area.

- The radon map shows an above-ground assessment of less than 1%.

- No areas of the School are located below ground (basement floor, plant room, etc).

Risk:

No risk has been identified. Findings have been recorded and no further action is required.

The risk should be reassessed a minimum of every ten years

26 Legionella Prevention

26.1 Legionnaires' disease is a potentially fatal form of pneumonia caused by inhaling small droplets of water that are infected with the legionella bacteria. It can affect anybody, but some people are at higher risk, including those over 45, smokers and heavy drinkers, those suffering from chronic respiratory or kidney disease, and people whose immune systems are impaired. The bacteria occur naturally in rivers, lakes etc as well as in the water systems of premises, such as Schools.

26.2 Specific Responsibilities

26.2.1 The School's specific day to day responsibilities for water safety include the duty to:

- Identify and assess sources of risk
- Prepare a scheme (or course of action) for preventing or controlling the risk
- Implement and manage the scheme
- Keep records for a minimum of 5 years.

26.2.2 Day to day responsibility for monitoring and ensuring that the systems are being correctly operated, lies with the Head of Estates who has attended a certificated course in water safety awareness. He maintains appropriate records of testing and certification.

26.3 Water Safety Risk Assessment

26.3.1 St Paul's School and St Paul's Juniors have employed uRisk, a firm of water safety specialists to prepare a water safety risk assessment for all the School buildings, including the boarding house.

26.3.2 The risk assessment identifies and assesses the main sources of risk in every building, taking account of:

- Water temperature
- Potential for water stagnation in long pipe runs and "dead legs" or infrequently used taps and showers
- Potential for aerosol formation, especially in showers, drinking water fountains and fire hoses
- Condition of the water throughout the premises
- The use thermostatic mixing valves (in order to avoid scalding) that potentially set a favourable outlet temperature for legionella growth
- Signs of debris in the system, such a rust, sludge or scale that could provide food for growing legionella

- Conditions of the pipe work, plant, tanks etc.

26.3.3 The risk assessment is reviewed and updated every two years, or each time that a new measure is introduced.

26.4 Physical Preventative Measures

26.4.1 The water safety risk assessment identifies a series of preventative measures to the physical structure of our buildings that have been taken in order to control the risk of legionella at the School:

- All metal cold water tanks have been covered to ensure that they are free from debris.
- "Point of use" water heaters have been introduced in the Science Building.
- All hot pipes and calorifiers/hot water tanks have been insulated.
- Water is heated and stored in the calorifiers/hot water tanks at temperatures above 60 degrees C in order to kill bacteria.
- Cold water is stored below 20 degrees C, so that bacteria cannot thrive.

26.5 Control Measures

26.5.1 Our risk assessments on our infrastructure identify the control measures that are necessary in order to ensure that there is no risk of contamination through legionella bacteria.

26.6 Internal Control Measures

26.6.1 Some of the Estates Team have been trained to identify legionella prevention measures. The Estates Plumber is tasked with carrying out the following regular water checks (all of which are recorded on a data sheet held in the Estates Department) in order to maintain good water hygiene:

Taps

- Monthly temperature checks to hot water are conducted by inserting a thermometer in the outflow of the first and last tap of each circulation system for the required period and recording the temperature. We will contact our Water Consultant about the safety implications if the hot water does not reach 50 degrees C after running for 5 minutes.
- Monthly temperature checks are carried out to the first and last cold water taps in order to ensure that they operate at below 20 degrees C after running for 2 minutes. We record the temperatures and will contact our Water Consultant about the safety implications if the cold water exceeds 20 degrees C after running for 2 minutes.
- At the end of the Summer Holidays, annually, the tanks are cleaned and the systems chlorinated.

Showers

- Shower heads and hoses are dismantled and descaled monthly.

Swimming Pool

- The water in the swimming pool is sampled daily.
- Chlorine levels are tested every day.

Cold Water Tanks

- Temperatures are taken from the water in the tank and the water in the ball valve every six months.
- The tank is inspected visually on an annual basis.

Calorifiers/ Hot Water Tanks

- The water temperature leaving and returning to the calorifiers/ hot water tanks is inspected on a monthly basis.
- The calorifiers/hot water tanks are inspected annually.

Cold Water Systems

- All cold-water systems that are unused during the holidays are also thoroughly flushed through before use.

26.7 External Control Services

26.7.1 We employ external contractors to help us to manage water safety in the following areas:

Heating plant

- Our boilers and heating plant are serviced annually.
- The heating system is serviced, sludge removed, annually.
- Inhibitor chemicals are topped up

Water Sampling

- An accredited Water Consultant conducts the following sampling and analysis of our water supplies:

Monthly: Swimming pool water is sampled and tested

Six-Monthly:

Plumbed water coolers and water fountains have filters changed.

Drinking water is sampled and tested

Annually: Water samples from the calorifiers are tested

The thermostats on taps are checked and repaired/replaced.

Point of use water heaters are checked and serviced

Cold water tanks and pumps are inspected

Drains: Sumps are inspected and jetted annually.

26.8 Records

26.8.1 Records are kept on the Estates Management electronic system, Parago, of all water system checks.

27 Employment of Contractors

27.1 Introduction

27.1.1 Contractors are routinely employed to work in the School on the maintenance, modification or installation of plant and equipment and in building operations. A contractor is anyone the School asks to do work for it who is not an employee.

27.1.2 Everyone working on our premises, either under our control or whose work could affect us or the public, should be aware of the Health and Safety standards they have to achieve.

27.1.3 The policies concerning safeguarding procedures for contractors are:

- [Contractors involved in Construction and Maintenance Contracts: Safeguarding Procedures](#)
- [Contractors, Agency \(Supply\) and Freelance Workers – Vetting Policy](#)

27.2 The Law and the Contractor

27.2.1 The Health and Safety at Work Act (1974) places duties on the employer and the contractor to protect the Health and Safety both of employees and other people who may be affected by work.

27.2.2 Such legal duties cannot be delegated by contract; however, when a formal contract is used, it can play a useful role in defining the rights and responsibilities of each party. It is vital when agreeing the contract that adequate time and money is provided for proper consideration of Health and Safety matters.

27.2.3 The contractor should be clear about:

- The School's Health and Safety Policy arrangements (to include child protection and safeguarding) and local rules, so that they can comply with them
- Specific requirements necessary for Health and Safety
- Relevant Health and Safety factors, such as the extent of hazardous areas (e.g. if asbestos is present) and where necessary, technical documentation and diagrams should be provided to the contractor. All known hazards under the School's control must be brought to the contractor's attention.
- Arrangements for matters such as site demarcation, site access, the use of permanently installed plant, the control of equipment and the control of exposure to hazardous substances

27.2.4 The contract should require the contractor to produce relevant information about any sub-contractors they wish to employ and how it is intended to control the sub-contractor's Health and Safety performance.

27.2.5 It is to be a condition of all contracts that the contractor will appoint a senior member of staff to maintain liaison with the School.

27.3 *Selecting the Contractor*

- 27.3.1 Contractors invited to submit tenders should be made fully aware of the standards of Health and Safety management expected of them.
- 27.3.2 A Contractor Safety Evaluation Questionnaire must be used before engaging a contractor.
- 27.3.3 The contractor must supply the School with a copy of his Health and Safety Policy. It needs to be assessed to ensure that it is compatible with our own and that it is appropriate for the particular work and location. It should adequately cover the issues relating to hazards which will be met in carrying out the work and the precautions necessary to eliminate or satisfactorily control them.
- 27.3.4 The contractor should be able to demonstrate that his employees who are responsible for overseeing Health and Safety matters are competent. This applies to senior employees as well as those who will manage and supervise on site.

27.4 *Planning the Work*

- 27.4.1 Successful use of contractors requires effective management and planning. Health and Safety aspects should be considered at the planning stage.
- 27.4.2 Together, the School and the contractor should consider:
- The School's own operations which may affect the contractor's work. All known hazards must be brought to the contractor's attention.
 - The need for any statutory assessments, for example under COSHH.
 - Who has overall responsibility for the management/control of work on site and control of sub-contractors? (Those with overall responsibility/control usually have Health and Safety responsibility).
 - Whether Health and Safety responsibility is clearly defined, even if work areas are not – e.g. during the commissioning of newly installed plant, or when several contractors are working concurrently.
 - Timing and segregating the work of sub-contractors to ensure that the activities of one will not create a risk for another.
 - The Health and Safety issues when setting down working methods – using drawings or sketches as necessary. Detailed written procedures will be necessary for complicated or hazardous operations.

27.5 *Child Protection Procedures*

- 27.5.1 The School has a duty to promote and safeguard the welfare of the children and young people for whom we are responsible. Contractors are required to comply with the School's Safeguarding and Child Protection Policy at all times. If in the course of carrying out their duties the contractor becomes aware of any actual or potential risks to the safety or welfare of children in the School he/she must report any concerns to one of the School's Designated Safeguarding Leads or, if they are concerned about the conduct of a member of staff, to the High Master or Head.

27.6 Liaise with the Contractor

- 27.6.1 The School will nominate a competent person to liaise with the contractor and monitor those working methods which have been designed to control risks which could affect the Schools' employees, pupils and visitors. This will generally be the Head of Estates.
- 27.6.2 The School and the contractor should keep each other informed about all known hazards and changes to plans or systems of work which may affect Health and Safety on site.
- 27.6.3 There should be regular site meetings between the contractor's supervisor on site and the School representative to ensure good communication is maintained.
- 27.6.4 The contractor should be regularly monitoring their own Health and Safety performance.

27.7 Information for the Contractor's Employees and Sub-Contractors

- 27.7.1 The main contractor should ensure that their own employees and sub-contractors are informed of the rules for safe working, the local hazards and necessary precautions. Each new contract employee coming on site should receive appropriate instruction and training.
- 27.7.2 It should be made clear which are the contractor's area of work and any restricted areas. Workmen etc should report to an appropriate point before beginning work at the School.
- 27.7.3 In particular, there should be no confusion over:
- The School's rules for the site, e.g. use of 110 Volts portable electrical tools.
 - Control and hand-over of occupancy, e.g. the use of barriers or other means to prevent accidental approach to potentially hazardous areas such as excavations.
 - What services the contractor may use and what plant/equipment they are allowed to bring on site.
 - What the contractor's employees should do in an emergency at the School, e.g. if the fire alarm sounds, and how they can safely reach the assembly point.

27.8 Health and Safety Executive Advice

- 27.8.1 Contractors working in Schools have not always made sufficient allowance for the added risks from having so many children on the premises. Further details are contained in "[Using Contractors – a Brief Guide](#)" (reference is INDG368(rev1), published 03/13).
- 27.8.2 By virtue of their overall responsibility for Health and Safety in the School, the Director of Operations needs to be aware of the general hazard created by building works. Pupils too need to be made aware of the hazards presented by building works. Additional supervision at break-time and lunch-time may also be required. The Director of Operations should liaise with the Surmaster and Head on these matters.
- 27.8.3 The HSE Guidelines stress the need for Health and Safety consideration to be given a high priority when major or minor building works are planned so that proper account can be taken of the needs and requirements of the School, e.g.:
- Access/exit to premises from the street
 - Access/exit to and within the buildings

- Playground facilities
- Services arrangements, e.g. food and stores deliveries
- Access routes for Emergency Services
- Security

27.8.4 Before building work commences, it is required that the building contractor appoint a senior member of their site staff to maintain day-to-day liaison with the School. The following matters will be discussed as appropriate:

- Access/exit requirements from the street as well as to and within the buildings
- Proposals for the use of scaffolding and ladders
- Proposals for separating the work areas from the open access areas
- Proposals for the positioning and fencing of skips and storage areas
- Any dangerous, noxious or offensive substances or processes to be used and the contractor's proposals for protecting staff and pupils
- Proposals for the contractor's essential services (sanitation, telephone, power, parking etc.)
- Whether visitors to the building works need to report to the Porters' Lodge as well as to the site office.

27.8.5 The contractor's liaison officer should maintain day-to-day communication with the School in respect of the work in hand. The School should be informed of the timing and progress of work and should be assured that any facilities designated as essential at the pre-site meeting are kept available for use.

27.8.6 During the course of the work, if the School feels that the contractor is disregarding safety procedures, or that staff or pupils will be put at risk by the contractor's actions, the School should:

- Contact the contractor responsible for the works immediately
- If there is an imminent risk, consult directly with the contractor with a view to eliminating the risk. **On no account must specific advice be given by the School on matter(s) which appear to be giving rise to risk**
- If there is still a risk, remove staff and pupils from the areas and then contact the contractor responsible for the works
- There follows a summary of the detailed recommendation of the Health and Safety Executive with respect to different types of work that might be carried out on our premises, and their Health and Safety implications

27.9 Summary of Previous HSE Recommendations with Respect to Different Types of Work

Work Sites

27.9.1 Wherever it is reasonably practicable to do so, work areas should be physically separated from areas used by staff and pupils. Parts of the premises not required by the School or the public for access should be enclosed within a boarded or sheeted perimeter fence at least two meters high.

- 27.9.2 The contractor should take precautions to eliminate as far as is reasonably practicable the danger to staff and pupils arising from the movement of all contractors' vehicles about the site.
- 27.9.3 Those parts of the site that must remain open to the School or public should be provided with all necessary footways and guard rails to ensure safe passage. Fire exits are to be kept clear at all times.
- 27.9.4 The contractor should provide the Head of Estates with reasonable warning before directing employees to begin new work or restart work whether outside the perimeter fence of the building works or inside it, which might affect the staff and pupils.
- 27.9.5 All contractors should implement a system of sign-posting to warn staff and pupils of dangerous operations, plant and chemicals, and of freshly applied materials.

Access Equipment

- 27.9.6 When ladders, scaffolding, cradles etc. are to be in position for less than a working day, a clear demarcation of warning tapes should be provided and maintained at least two meters clear of the equipment. During this period the equipment must not be left unattended.
- 27.9.7 When ladders, scaffolding, cradles, etc. are erected and positioned for more than a working day, a substantial barrier should be provided and maintained to prevent unauthorised access.
- 27.9.8 All scaffolding, hoists and barrier fencing should only be erected or dismantled when the surrounding areas are clear of staff and pupils. Similarly, mobile scaffolding and ladders should only be moved in occupied or open access areas when these are clear of staff and pupils.
- 27.9.9 It is the contractor's responsibility to obtain handover certificates from scaffolders etc., subsequently to inspect the equipment and then to sign the statutory registers. A hoist requires inspection once a week.
- 27.9.10 Satisfactory storage arrangements must be agreed on for scaffolding tubes and fittings. Ladders and ropes should be secured out of reach of children and unauthorised people.

Overhead Working

- 27.9.11 When work is undertaken on or in roofs which are above or adjacent to occupied rooms, the occupants must be given all necessary protection or the rooms immediately below should be evacuated for the duration of the work.

LPG and Bitumen Boilers

- 27.9.12 LPG cylinders not in use should be stored in the open air in a well-ventilated area at ground level on a firm even surface at least three metres away from cellars or drains, and in a position where the storage will not prejudice existing means of escape. Any weather protection must be of non-combustible material and must not prohibit ventilation. The storage area should also be away from any source of ignition.

27.9.13 No LPG cylinders should be left unattended in open access areas. At the end of the working day, all cylinders should either be returned to secure storage on site (as above) or removed from the site.

27.9.14 LPG cylinders used with bitumen boilers should be at least three metres from the burners. The boiler and cylinders should be located where they are unlikely to be struck by site traffic, including wheelbarrows. Any damaged flexible hose must be replaced. No boiler should be left unattended or moved with the burner alight.

Excavations

27.9.15 All excavations in open access areas must be covered while they are not in immediate use. All excavations more than one metre deep must be fenced with barriers etc. and appropriate warning signs erected.

Dangerous, Noxious or Offensive Substances

27.9.16 At the pre-site meeting, the contractor should provide the School with relevant information on any dangerous, noxious or offensive substance or process to be handled or used on site which might present a risk to the Health and Safety of staff and pupils. Precautions to be considered include storage, restrictions on the use of buildings and open access areas by staff and pupils, restrictions in working hours by the contractor and physical protection. It is essential that there is liaison with the School.

27.9.17 If any of the contractor's work involves the disturbance of asbestos, a written system of work would be agreed by all parties before the work begins. If work being undertaken encounters asbestos, it should be left undisturbed and the School contacted immediately.

Stripping Paint

27.9.18 All paint work which is to be stripped should be treated as containing lead unless it has been tested and proved to be lead free. If the area concerned is not handed over entirely to the contractor, the School should be advised in advance of the time when the work will take place.

27.9.19 Burning off paint on the external surfaces of doors, window frames, etc. should not take place while the rooms they serve are occupied and no burning off should take place within buildings.

27.9.20 When stripping is taking place, dust sheets should be placed beneath the work area to catch all stripped material whether it is removed by burning, scraping rubbing down or chemical means. Plastic sheeting should not be used during burning off.

27.9.21 Adequate provision should be made for the ventilation of rooms in which chemical stripping has taken place before the rooms are made available for re-occupation.

27.9.22 Constant cleanliness is essential. Periodic cleaning of the floors, playground, paths etc. beneath stripped areas should take place regularly (during the day) while work is in progress, and especially immediately before known major use of the area by the pupils.

27.9.23 All rubbing down internally and externally should be with wet abrasive. All debris should be kept damp and re-dampened before removal. Debris inside buildings should be swept up and the floor then washed. Debris outside the buildings should be swept up and the yard then hosed down or cleaned with an industrial vacuum cleaner. All the debris collected should be properly bagged and disposed of by the contractor. It must not be stored on site or placed in local authority dustbins. Dust sheets used during stripping should not be subsequently used elsewhere on site until they have been thoroughly cleaned off the site.

28 Permits to Work

28.1 The School issues the following permits to work, as appropriate, to contractors engaged on the School site:

- Master Permit to Work
- Confined Space Entry Permit
- Isolation Permit
- Excavation Permit
- Fire Alarm Isolation Permit
- Hot Works Permit
- Working at Height Permit
- Roof Access Permit

Permits are issued by the Operations Coordinator or the Porters and contractors are not permitted to begin work without one. This is expressly communicated during the Contractor Induction process.

29 Construction (Design and Management) Regulations (CDM)

29.1 Introduction

29.1.1 The Construction (Design and Management) Regulations 2015 (CDM 2015) came into force on 6 April 2015, replacing CDM 2007. Further details are in "[Managing health and safety in construction - Construction \(Design and Management\) Regulations 2015](#)" (Reference is L153 Published 2015). These Regulations are in addition to existing safety regulations associated with health and safety and construction.

29.2 Duties of the Client

29.2.1 CDM 2015 defines a client as anyone for whom a construction project is carried out, therefore the School is defined as the client for the CDM Regulations. CDM 2015 makes the client accountable for the impact their decisions and approach have on health, safety and welfare on the project. They are not required to take an active role in managing the work. However, the client is required to make suitable arrangements for managing the project so that health, safety and welfare is secured.

29.3 CDM Planning Arrangements

- 29.3.1 To be suitable, the arrangements should focus on the needs of the particular project and be proportionate to the size of the project and risks involved in the work. Arrangements should include:
- (a) assembling the project team – appointing designers (including a principal designer) and contractors (including a principal contractor).
 - (b) ensuring the roles, functions and responsibilities of the project team are clear.
 - (c) ensuring sufficient resources and time are allocated for each stage of the project – from concept to completion.
 - (d) ensuring effective mechanisms are in place for members of the project team to communicate and cooperate with each other and coordinate their activities.
 - (e) how the client will take reasonable steps to ensure that the principal designer and principal contractor comply with their separate duties. This could take place at project progress meetings or via written updates.
 - (f) setting out the means to ensure that the health and safety performance of designers and contractors is maintained throughout.
 - (g) ensuring that workers are provided with suitable welfare facilities for the duration of construction work.
- 29.3.2 The School will take ownership of these arrangements and ensure they communicate them clearly to other members of staff. The School could prepare a clear “client’s brief” as a way of setting out the arrangements. The client brief normally:
- (a) sets out the main function and operational requirements of the finished project.
 - (b) outlines how the project is expected to be managed including its health and safety risks.
 - (c) sets a realistic timeframe and budget; and
 - (d) covers other relevant matters, such as establishing design direction and a single point of contact in the client’s organisation.
- 29.3.3 Where the range and nature of risks involved in the work warrants it, the management arrangements should also include:
- (a) the expected standards of health and safety, including safe working practices, and the means by which these standards will be maintained throughout;
 - (b) what is expected from the design team in terms of the steps they should reasonably take to ensure their designs help manage foreseeable risks during the construction phase and when maintaining and using the building once it is built;
 - (c) the arrangements for commissioning the new building and a well-planned handover procedure to the new user.

29.4 The Principal Designer

- 29.4.1 Principal designers are designers appointed by the client in projects involving more than one contractor. They can be an organisation or an individual with sufficient knowledge, experience and ability to carry out the role. They plan, manage, monitor and coordinate health and safety in the pre-construction phase of a project.

29.5 The Principal Contractor

29.5.1 Principal contractors are contractors appointed by the client to coordinate the construction phase of a project where it involves more than one contractor. They plan, manage, monitor and coordinate health and safety in the construction phase of a project.

30 Security

31.1 Security is a matter that will be kept the subject of ongoing discussions with the local police authorities. This should be read in conjunction with [Security, Access Control, Workplace Safety and Lone Working Policy](#) which is found on the intranet.

30.2 Aim

30.2.1 As far as is reasonably practical, our School will be secure and we will prevent unwanted trespassing on our premises. To achieve this, the co-operation and vigilance of employees, parents, pupils and those organisations that use the facilities are required; however, no one must place him or herself in personal danger.

30.3 Control Measures

30.3.1 The practical control of access to our premises is principally by:

- The School employs a Security Team under control of the Security and Facilities Managers.
- Perimeter fencing and Pyracantha hedging
- Vehicular and pedestrian gates
- Locking buildings
- CCTV
- Visitor and contractor identification badges
- Vigilance by staff

30.4 Reporting

30.4.1 Anything untoward should always be reported to the Schools' Receptions and passed on to the Security Team. Where required, an [Incident Report](#) should be completed.

30.5 Security Log

30.5.1 The Head Porter maintains a written record of all security incidents.

30.6 CCTV coverage

30.6.1 The School has a number of CCTV cameras at various places in and around the School to give the School, its staff, pupils and property protection. Further details can be found in the School's [CCTV Policy](#).

30.6.2 Notices are in prominent positions giving notice of the presence of CCTV operating on the School grounds.

- 30.6.3 The School will take all reasonable steps to ensure that any security measures (including the use of CCTV) do not compromise or unnecessarily intrude on the reasonable privacy of staff or pupils or others whilst they are on the School premises.
- 30.6.4 An audible alarm, set off with Panic Buttons, is designed to alert all staff, pupils and visitors of unauthorised entry to the School, where the security team deem it necessary to 'lock down' the School while they deal with the threat.
- 30.6.5 The Thames Water Board's Compound within the School's grounds is covered by their own CCTV installation.

C3: Teaching and Learning and Co-Curricular Arrangements

31 The School's Local Regulations, Guidelines and Departmental Policy

- 31.1 Certain areas of the School's activities are deemed to be of higher risk than others. These areas have developed supplementary policies and have documented and recorded any additional safety policy.

32 Ionising Radiations

32.1 Action Required

- 32.1.1 The School has appointed a Radiation Protection Supervisor (RPS). The duties of the School's RPS follow at the end of this document.
- 32.1.2 The radiation sources held are listed in the Radiation Protection Adviser's Report dated January 2024. The total activity permitted per School is 1.2 MBq (~30 μ Ci) in sealed sources.(-CLEAPPS L093).
- 32.1.3 We have appointed an external company to act as Radiation Protection Advisers (RPA).
- 32.1.4 The RPS must ensure that local rules (see below) governing the storage, handling and use of radiation sources in the School have been drawn up and are kept up-to-date.
- 32.1.5 The RPS must prepare risk assessments for all sources and draw these to the attention of all relevant teaching and technical staff.
- 32.1.6 All sources must be stored securely and in a lockable metal cabinet (this includes cloud chamber sources). No other items may be stored in the cabinet. The storage area must be signed with a radiation hazard warning sign.
- 32.1.7 There must be an up-to-date list of sources together with a note of the date(s) purchased.
- 32.1.8 There must be an administrative system recording the movement of sources using a source movement book/log.

- 32.1.9 The RPS must be notified immediately if any source is lost, stolen or damaged.
- 32.1.10 We are strongly advised not to hold any uranium compounds. In any event, the holding must be below 100 grams. Uranium compounds (up to 100 grams) may be put for disposal in normal rubbish (as above).
- 32.1.11 The RPS is responsible for ensuring leakage tests are carried out on the sealed (closed) sources in the School and for ensuring appropriate records are kept. Information on record keeping together with a Leakage Test Protocol follows. Cloud chamber sources need not be leakage tested.
- 32.1.12 The RPS should be appropriately trained.
- 32.1.13 Advice should be obtained from the RPA before new sources are acquired.
- 32.1.14 The Fire Folder, held at reception and managed by the Head of Estates, should notify the local Fire Rescue Service of the whereabouts of the radiation source store.
- 32.1.15 Records of all disposals of radioactive sources must be kept by the School. Records should include the date of disposal and, if appropriate, the name of to whom it was sent or by whom it was removed.

32.2 St Paul's School Local Rules – Use of Closed Sources

- 32.2.1 The name of the Radiation Protection Supervisor (RPS) is: Simon Parsons. Contact details for the RPS are held by the Physics and HR Departments. The Radiation Protection Advisor (RPA) is Keith Bowker (Oxford Radiation Consultants (ORC) 01235 538238 Mon - Fri, 8am - 5pm or 07831 651726 at other times).
- 32.2.2 The personnel authorised to use the sources are held by the RPS. The School is in DfE Category C with respect to work with ionising radiations. This allows the use of the following within the School:
- Sealed sources
 - Thoron generators
 - Protactinium generators
 - Cloud chamber sources
 - Radioactive rocks
- 32.2.3 The normal location of the sources is within a dedicated metal cabinet in the locked Gas Cylinder Storeroom. The copies of the key for this Store are kept by the technician team.
- 32.2.4 If evacuation is required for any reason whilst sources are out of storage and being used in a classroom or laboratory, the following procedure must be followed:
- The teacher, who should be the last person out of the room, must secure the samples in a suitable cupboard in the lab and report their location to the fire marshal.
 - All source location(s) must be reported to the Fire Officer/ Fire Brigade by fire marshals as appropriate.
 - The relevant teacher or technician should be on hand to speak to the Fire Brigade as required and bring the log book with them.

Confirmation from fire marshals that sources are securely stored is part of standard fire drill procedure.

- 32.2.5 The use of sealed sources by individual pupils is restricted to A level courses.
- 32.2.6 Persons using the sources should record the date of removal and return of each source in the record book provided. This will usually be done by the Physics Technician.
- 32.2.7 All sources should be handled with tweezers/tongs and the area where sources are to be used by pupils delineated using signs or warning tape.
- 32.2.8 Wherever possible, only one box of sources should be used at any one time in any one container. Sources not in use should remain in their containers.
- 32.2.9 The RPS is responsible for keeping suitable records.
- 32.2.10 The Physics Technicians are responsible for checking closed sources after use for any damage.
- 32.2.11 Any loss or theft of a source must be reported to the RPS, who in turn must inform the RPA immediately. The RPS, in consultation with the RPA, will be responsible for any notification to the Health and Safety Executive and Department for Education and Skills, the Environment Agency and the police.
- 32.2.12 Pupils under the age of 16 are not allowed to handle the sources. Demonstration practical classes are allowed. They may use cloud chamber sources, instruments with luminous dials and rock samples (using forceps).
- 32.2.13 Any trainee or temporary staff needs supervision.
- 32.2.14 All teachers and technical staff handling sources must be fully aware of the appropriate risk assessment. Any female employee handling the sources is requested to notify the RPS if she becomes pregnant. Risks to the member of the staff will then be reviewed by the RPS.
- 32.2.15 Any students over 16 years of age using sources must be supervised and given a copy of these local rules.

32.3 *Leakage Test Protocol*

Introduction

- 32.3.1 The Ionising Radiations Regulations requires that leakage test of sealed (closed) radioactive sources used in Schools must be carried out at least every 24 months. The majority (+99%) never leak and the protocol described below is a simple and acceptable method of complying with the Regulations. Where the source is found to be 'leaking', a more quantitative and detailed evaluation is essential. This will be carried out by the RPA.
- 32.3.2 Testing should be carried out at the time of the year suitable for the School, bearing in mind the 26-month maximum period between tests. The Regulations require that records of all such tests must be kept for at least five years after the tests have been carried out.

32.3.3 The work can be carried out by physics teaching staff or by the Physics Technicians.

Method

32.4.1 The method of test is wipe test. Take a small (say 2" diameter) filter paper, fold it into four and moisten the tip of the quarter circle filter paper thus formed, with either water or water/ethanol mixture. Alternatively, a tissue or commercially purchased wipes can be used.

32.4.2 Remove the source in its box. Holding the source with tweezers in one hand and the filter paper in tweezers with the other hand, wipe the source with the moistened end of the wipe. All around the bottom and the case of the source should be wiped. A wiping period of 20 to 30 seconds is sufficient.

32.4.2 Replace the source in its container. Any radioactivity removed onto the wipe can be counted using the School's own scaler/ratemeter.

32.4.3 Before carrying out the counting, open up the filter paper and place flat on the bench. Bring the counting detector within 0.5 cm of the filter paper.

32.4.4 The counting period should be at least one hour. Remove the filter paper and carry out a background count for the same counting period.

32.4.5 From the results, it is possible to calculate the approximate activity (in Becquerel) on the wipe.

32.4.6 Filter paper count minus the background count should be multiplied by the counting efficiency of the scaler for the particular isotope of the source wiped.

32.4.7 Scaler detectors are usually based on Geiger-Müller tubes and these are quite efficient for gamma sources, such as Radium-226 and Cobalt-60, but less efficient for beta emitters and for Americium-241.

32.4.9 Allowance should also be made for the fact that the wipe test does not remove all "leaked" activity from the source. Usually, it is assumed that 20% of the activity has been removed. If the results show an activity removed in excess of 150 Becquerel, you are advised to contact the RPS as soon as possible.

Records

32.5.1 The record of the leakage test must contain the following:

- Name and address of the School
- Nature and activity of the source, together with identification
- Test result ("satisfactory", if no significant activity is found on the wipe)
- Reasons for test ("periodic test")
- Name and signature of person carrying out test
- Date of test

32.6 Duties of the Radiation Protection Supervisor (RPS)

- 32.6.1 Keep an up-to-date list of radiation sources and notify the Radiation Protection Adviser (RPA) of any changes.
- 32.6.2 Ensure that all teachers and technical staff handling radioactive sources are fully aware of the appropriate risk assessments. Any female employee handling radioactive sources is requested to notify the RPS if she becomes pregnant in order that the risks may be reviewed.
- 32.6.3 Ensure sources are kept in a proper store.
- 32.6.4 Ensure a log book is kept containing information, re-identified sources and source movement.
- 32.6.5 Ensure leakage tests are carried out at 26 monthly intervals and records are kept.
- 32.6.6 Arrange safe disposal of sources via the RPA if necessary.
- 32.6.7 Liaise with the local Fire Rescue Service on the source whereabouts.
- 32.6.8 Liaise with the RPA if an emergency arises.
- 32.6.9 In the first instance, provide advice to any teacher who wishes to carry out non-standard work with sources.

32.7 Matters to be Considered in Risk Assessments Are:

- Persons at risk
- Nature of the sources to be used, including properly closed sources of low activity, rock sets, thoron and protactinium generators, apparatus/items containing radioactive, e.g. luminous dials, and any other sources
- Instruments with luminous dials should also be subject to a risk assessment
- Estimated radiation dose rates to which anyone can be exposed
- The likelihood of any contamination (not likely for closed sources regularly wipe tested)
- Any advice from manufacturer or supplier
- Planned system of work
- The need for any personal protective clothing, e.g. gloves when handling rock sets
- Possible accident situations, their likelihood and potential severity
- Steps to prevent identified accident situations
- The need to consider altering work conditions for employees who become pregnant
- Maintenance and test schedules necessary, e.g. fume cupboards, leak testing, etc.
- Any instruction and training needs
- The need to designate areas for using sources
- The responsibilities of individuals in the School for ensuring compliance with the Regulations
- An appropriate programme of monitoring or auditing arrangements
- Risk assessments should have a conclusion, e.g. the use of sources present only a very low risk, etc.

33 Sports Activities

- 33.1.1 Some sports are inherently hazardous where the risks of injury resulting from non-specialist supervision of participants are proportionately large.
- 33.1.2 The rules for swimmers, pupil rowers and fencers etc. and the arrangements for their supervision must be in writing.

33.2 Swimming Pool

- 33.2.1 Pool Safety Operation Procedures have been prepared by the PE Department. The resulting **Normal Operating Procedures** and the **Emergency Action Plan** are detailed in separate documents available in the Staff Handbook.
- 33.2.2 Water quality is important as infections etc. can be transmitted by inadequately treated water. The safe operating limits of the pool, pH and free chlorine in particular, have been established and regular testing is carried out with each and every result recorded.
- 33.2.3 The swimming pool and adjacent areas should be cleaned every weekday by washing.
- 33.2.4 The pool is checked by the Duty Engineer on weekdays and at least once a day on weekends, including Bank Holidays, when the School is closed. A record of the pool checks is maintained by the Estates Department.

34 Visits and Activities out of School

- 34.1 There is a separate [Educational Visits Policy](#) for Educational Visits. There is also additional information for Staff in the Staff Handbook. The Policy is also available on the School website.

35 Woodworking Machinery

- 35.1 As with many machines, it is not possible to fully guard woodworking machinery. Safety is achieved by a high standard of guarding, provision of safety devices and stop buttons, as well as ensuring that operators are properly trained and competent.
- 35.2 The only persons permitted to use woodworking machines in the School are those who are competent and authorised to do so or who are under adequate supervision. The relevant head of department will decide authorised personnel.
- 35.3 Key switches for the mains power and/or locked doors are to be used to ensure that unauthorised persons do not have ready access to the machines.
- 35.4 Pupils are not to be allowed to use either band saws, circular saws or planing machines.
- 35.5 Adequate space is to be provided around woodwork machines. Space of one metre more than the maximum length of material to be machined on three sides of the machines will be provided.

- 35.6 Workshops are to have a sound, level floor with anti-slip qualities. Adequate lighting will be provided.
- 35.7 Except for hand-held machines, all woodworking machines are to be securely fixed to a floor or bench when in use. Each machine will be provided with a recessed start button and a larger, mushroom-headed stop button or foot control.
- 35.8 A written risk assessment must be produced by all relevant heads of department, to indicate all control measures for using woodworking machinery safely, including the appropriate dust control measures such as:
- No power sanding using fixed equipment will be carried out indoors unless the machine is fitted with dust extraction facilities
 - Circular saws and planer/thicknessers are to be fitted with extract facilities unless use is very intermittent
 - All extraction facilities are to be thoroughly inspected and tested every 14 months. Records of such inspections and tests will be kept under the direction of the appropriate head of department
- 35.9 In the Engineering and Technology Centre, all fixed machines meet the above requirements. Guidance about who is and who is not allowed to use particular machines is included in the Departmental Arrangement, together with detailed guidance and advice.

36 Work Experience

- 36.1 It is the Schools' policy that the Work Experience Placement Scheme operates solely within the UK, regardless whether the School finds the placement or pupils find their own placements within family or friends' businesses. The School, as organiser of the Work Experience Placement Scheme, has a legal responsibility to ensure that all placement providers are suitable, that they comply with Health and Safety legislation and are adequately insured. There is no mechanism for carrying out such checks abroad. There is a particular insurance concern outside of the UK in that employers' insurance (Employer and Public Liability) may not cover work placement pupils, as it does within the UK. In that event, pupils would not be able to claim for any injury for which the placement provider can be held legally liable. The placement would also be outside of the School's scheme, would not be deemed a "School activity" and therefore, the pupil would not be covered by the School's Public Liability Insurance with respect to his legal liability for injury to third parties or third party property.

37 Pupil Supervision

37.1 *Responsibility for Pupils During Lessons*

- 37.1.1 All staff must be aware that they are personally liable for the care of pupils during timetabled lessons. The School's duty of care has been delegated to the member of staff concerned, and in the case of cover, further delegated. The position of pupils outside the classroom is therefore sensitive.

37.1.2 If a pupil is to be sent to the Library or elsewhere for research, this should be agreed in advance with the Librarian or the supervising teacher (e.g. Computer Gallery). If a pupil is required to leave the room for any purpose, the member of the staff should know where he is, why, and for how long he will be absent. It is not normally appropriate to allow a pupil to leave the room during a lesson.

37.1.3 A pupil should not be sent out of the room as a sanction. If there appears to be no alternative, then they must not leave the teacher's sightline. If there is a persistent need to arrange an alternative working space for a pupil, then this must be formally supervised by a colleague.

37.2 *Duty of Care On and Off Site*

37.2.1 All teachers have a duty of care to supervise pupils who attend School at all times whilst they are under the care of the School (both on and off site).

37.2.2 The School will ensure that there is an adequate ratio of staff to pupils to ensure proper supervision of pupils whilst they are under the School's care. All ratios will be determined by risk assessment.

37.2.3 Factors which may be relevant include:

- The age, abilities, behaviour and any special needs or disabilities of pupils;
- The nature of the activities in which they are engaged;
- The location, environment and conditions in which the activity will take place;
- The number, competencies and qualifications of available supervisors;
- The availability of first aid cover;
- Contingency arrangements for staff absences and illness;
- Contingency arrangements for other incidents or emergencies;
- Travel, transport and accommodation arrangements.

37.2.4 There will be adequate back-up arrangements in place to provide cover in the event of a supervisor's unforeseen absence or incapacity. Such arrangements may include the redeployment of other suitable supervisors, regrouping of pupils within classrooms or boarding house or reorganising activities.

37.2.5 Where possible, there should be provision within the ratio for sufficient supervisors, in the event of an emergency or incident, to:

- Deal with any emergency or incident;
- Seek emergency and / or medical assistance and / or administer first aid;
- Supervise the remainder of the pupils.

37.2.6 The School has a separate policy in relation to offsite trips and visits, which includes details of the arrangements for the safety and supervision of pupils during such trips and visits, and whilst travelling to and from the School on such trips and visits.

37.2.7 The duty of care is a wide-ranging assumption of responsibility for others, and ranges from the requirement to observe Health and Safety legislation to the need to create a safe moral and physical environment for all those within the School community. The duty to protect the vulnerable, including all pupils is often passive, requiring awareness of a situation, and

ensuring pupils' protection from harm or self-harm, but can be active, for example, in acting when any sign of bullying or unfair behaviour is observed. There are many grey areas in this field, e.g. School gates, responsibility and deciding when a child is deemed to have left the School's responsibility and has been returned to its parents' care. If in doubt, it is better to be over aware; the parents of pupils required for rehearsal after School, for example, should always know at what time to expect their sons to leave. Bus stop duty is an active responsibility. Certainly, on any School trip it is important to observe all requirements for signatures from parents to devolve responsibility to teachers with authority.

- 37.2.8 Outside lesson time (e.g. morning break and lunch time, inside and outside the building) it is important that all members of staff take responsibility for pupils in the sense that they are vigilant to cases of unacceptable behaviour, pupils who may be hurt or upset, and that members of staff deal with these appropriately on the spot, and report back to Tutors, Undermasters etc.
- 37.2.9 The Undermasters have regular patrols at lunchtime and more staff are out on the fields directing activities. Boys are expected to report directly to them or the School nurse whichever is quickest in the event of an accident.

C4: Staff Health, Safety and Wellbeing Arrangements

38 Working at Heights Regulations

38.1 Introduction

38.1.1 These Regulations apply to all work at heights where there is a risk of a fall liable to cause personal injury. The purpose of the Working at Height Regulations 2005 is to prevent death and injury by a fall from height. There are now no height limits. The Regulations place duties on employers, the self-employed and any person who controls the work of others to the extent of their control (e.g. the Director of Operations who may contract others to work at height, such as window cleaners). The Regulations do not apply to the provision of instruction or leadership in caving or climbing by way of sport, recreation, team building, or similar activities.

38.2 Requirements

- 38.2.1 The Regulations require duty holders² to ensure that:
- All work at height is properly planned and organised
 - Those involved in work at height are competent
 - The risks from work at height are assessed and appropriate work equipment is selected and used

² The Director of Operations retains the overall responsibility for implementing the policy, but in the context of School activities, responsibility is likely to be delegated to those (e.g. Head of Estates and HoDs) giving instructions to others where the instructions involve persons working at height.

- The risks from fragile surfaces are properly inspected and maintained
- Equipment for work at height is properly inspected and maintained

38.2.2 There is a simple hierarchy for managing and selecting equipment for work at height:

- Avoid work at height wherever possible
- Use work equipment or other measures to prevent falls where working at height cannot be avoided
- Where the risk of a fall cannot be eliminated, measures must be taken to minimise the distance and consequences of a fall should one occur

38.2.3 The Regulations include a number of schedules giving detailed requirements for existing places of work and means of access for work at height; for collective fall prevention (e.g. guardrails and working platforms); for collective fall arrest (e.g. nets, airbags, etc.); for personal fall protection (e.g. work restraints, fall arrest and rope access) and for ladders.

38.2.4 Operational information is summarised in the following sections:

- Window cleaning
- Roof safety systems
- Ladders and Mobile Elevating Work Platforms (MEWP)
- General access scaffolding
- Tower scaffolding

38.3 Action Required

38.3.1 Employers following current good practice for work at height should already be doing enough to comply with the Regulations. The School ensures that risk assessments already in place for work at height activities are reviewed. Duty holders must make sure that all work at height is planned, organised and carried out by competent persons and that the hierarchy for managing risk for work at height is being followed, duty holders must also ensure that the most appropriate work equipment is to be used and that collective measures to prevent falls, such as guardrails and working platforms, are in place before measures which may only mitigate the distance and consequences of a fall, such as nets, or which may only provide personal protection from a fall.

38.3.2 All fragile roofs must be hazard signed.

38.4 Window Cleaning

38.4.1 The Health and Safety Executive (HSE) has produced several guidance documents concerning window cleaning:

1. Safety in window cleaning using portable ladders MISC 613
2. Safety in window cleaning using suspended and powered access equipment MISC 611
3. Safety in window cleaning using rope access techniques MISC 612

38.4.2 These publications should be used to evaluate the safety of window cleaning operations, which are normally carried out by contractors.

38.4.3 The School ensures that contracts for window cleaning require the work to be carried out in accordance with relevant HSE guidance.

38.5 Roof Safety Systems

38.5.1 Latchway cable systems can be installed either for work restraint or for fall arrest as an alternative to provision of edge protection. Eyebolts can get installed whether for work positioning in conjunction with Latchway cables, or for window cleaning. Cradle systems either on runways or from beam locations can be installed to provide safe access for window cleaning.

38.5.2 All systems must be examined at intervals not exceeding 12 months (six months for cradle systems). Repair, replacement or full de-commissioning and provision of alternative systems are necessary where equipment is found to be sub-standard.

38.5.3 Training must be provided for all employees who need access to the roof etc. Individuals must not be allowed to use these safety systems unless they have received appropriate training. Contractors should provide a method statement for risk assessment and proof of training before commencing work.

38.6 Ladders and Mobile Elevating Work Platforms (MEWP)

38.6.1 Ladders and stepladders are regarded primarily as a means of access. They should only be used at workplaces for short periods of time and then only if the use of more suitable equipment is not justified because of low risk and when the residual risk is adequately controlled. It is generally safer to use a tower scaffold or a MEWP.

Ladders (including step ladders)

38.6.2 More information is contained in the following:

- Working at Height – a brief guide INDG401 (Rev2) published 01/14
- Safe use of ladders and step ladders LA455 published 2021

38.6.3 The use of ladders is only permitted where the use of more suitable work equipment such as tower scaffolds, podium steps, temporary stairs or MEWPs is not appropriate and:

- The work can be reached without stretching
- The ladder can be secured to prevent slipping
- A good handhold is available unless, in the case of a step ladder and when carrying a load, the maintenance of a handhold is not practicable

38.6.4 Timber and aluminium ladders must conform to the appropriate British Standard or other standard (e.g. Class 1 – heavy duty or otherwise suitable for work). Class 3 ladders are intended for domestic use only and are not recommended for use at work.

38.6.5 Ladders must be in good condition. The School is responsible for implementing a programme of regularly examining ladders under their control and records of these examinations are kept. There must also be visual inspection before each use, which involves checking that:

- The stiles are not damaged, buckled or warped
- No rungs are cracked or missing

- Safety feet or their safety devices are not missing
- 38.6.6 Painted ladders should not be used as the paint may hide faults. Coating with preservative and clear varnish is recommended.
- 38.6.7 Ladders, not step ladders, must be correctly angled (one out for every four up, e.g. approximately 75 degrees to the horizontal). Where ladders are used as a means of access they should extend approximately one metre above the access platform, unless some other adequate handhold is available.
- 38.6.8 Ladders must only be used on a firm, level surface and they should rest against a solid surface, not against fragile or other insecure materials such as plastic guttering or asbestos cement sheet. Ladders must be secured from falling. If a ladder cannot be secured by a physical fixture, then a second person must foot the ladder during use.
- 38.6.9 The top platform of a step ladder must not be used unless it is designed with handholds for that purpose.

MEWPs

- 38.6.10 The use of MEWPs must be the subject of a prior risk assessment. The person operating the equipment must be trained and competent. The platform must be provided with guardrails, toe boards or other suitable barriers to prevent falls. MEWPs must be in good condition and used on firm and level ground.
- 38.6.11 MEWP's must be maintained in accordance with the manufacturer's instructions and thoroughly examined at six monthly intervals by a competent person. Where MEWPs are the property of the School, the thorough examination will be carried out by the School's insurers and the insurance company must be informed in writing that this is required. Records of regular maintenance and thorough examination must be retained.

General Access Scaffolding

- 38.6.12 This is used primarily on work under the control of 'main' contractors but some may be used via direct contracts placed by the School. Where the last is the case, scaffold contract companies must provide written, detailed evidence of their competence.
- 38.6.13 Scaffolding must be inspected by a competent person:
- Before it is put into use.
 - At seven-day intervals until it is dismantled.
 - After bad or excessively dry weather or high winds or another event likely to have affected its strength or stability.
 - After any substantial additions or other alterations.
- 38.6.14 A written report must be prepared by the competent person. The report will normally be written out at the time of the inspection but must be provided within 24 hours.

38.6.15 A copy of the report must be kept on site in an appropriate place with a named person. A further copy must be retained for a period of three months from the completion of the work in the office of the person on whose behalf the inspection was carried out.

38.6.16 Any School department placing a contract for scaffolding work must ensure that inspection will be carried out and that appropriate inspection reports are available for viewing by external inspectors.

38.6.17 A holder of CITB Advanced Scaffold Inspection Certificate or equivalent will be accepted as being competent to carry out general access scaffolding inspections.

38.6.18 In the event that scaffolding fails inspection, this must be verbally reported to the person responsible for placing the original contracts as soon as possible by the person carrying out the inspection. The necessary remedial action must be carried out by the scaffolding company and a re-inspection carried out by the competent person before the scaffolding can be put into use, or further use.

38.6.19 Where scaffolding is erected in an area accessible generally to pupils, employees or the general public, the following should apply:

- The minimum amount of equipment and material should be stored on the scaffold
- Persons should be prevented from walking under or near the scaffold by means of physical barriers (not tape)
- All ladders at ground level should be removed when scaffolding is left unattended

Tower Scaffolding (whether prefabricated or not) including those on hire

38.6.20 Formal instruction and training must be provided for all those who erect tower scaffoldings and these persons must be competent. Training may be provided by the company supplying the tower scaffolding or some other reputable external organisation. Towers should rest on firm level ground with the wheels or feet properly supported. Safe access to and from the work platform must be provided.

38.6.21 Tower scaffolding must be inspected by a competent person and a record of the inspection must be made and kept for three months after dismantling the scaffolding.

38.6.22 Inspections are required:

- Before first use
- After substantial alterations
- After any event likely to have affected its stability
- If the tower remains erected in the same place for more than 7 days

38.6.23 Any fault should be put right before further use.

38.6.24 Consideration should be given to whether the area around the base of the tower needs to be a designated hardhat area.

38.6.25 Barriers must be erected at ground level to prevent people walking into the tower.

38.6.26 If the scaffolding is to remain in position unattended, unauthorised access to it must be prevented by removing or boarding over the access ladder.

39 Manual Handling and Lifting

39.1.1 The Manual Handling Operations Regulations 1992, as amended in 2002 apply to a wide range of manual handling activities, including lifting, lowering, pushing, pulling or carrying. The load may be either animate, such as a person or an animal, or inanimate, such as a box or a trolley. The Health and Safety Executive (HSE) publish more detailed guidance in their leaflet "[Manual Handling at Work](#)" (reference 11/12 INDG143(rev3))

39.1.2 This legislation primarily affects employees, not pupils because pupils should never be required to undertake manual handling operations likely to cause injury.

39.1.3 There is a statutory duty to avoid the need for manual handling operations involving a risk of injury, so far as is reasonably practicable. The Regulations do **not** ban manual handling operations.

39.1.4 Then there is a duty to assess the risks in those manual handling operations which cannot be avoided.

39.1.5 The Regulations require the School to:

- Avoid the need for hazardous manual handling, so far as is reasonably practicable;
- Assess the risk of injury from any hazardous manual handling that can't be avoided; and
- Reduce the risk of injury from hazardous manual handling, so far as is reasonably practicable.

39.1.6 Employees have duties too. They should:

- Follow systems of work in place for their safety. These are outlined in the Departmental Risk Assessments and other Risk Assessments held by the School;
- Use equipment provided for their safety properly;
- Cooperate with the School on health and safety matters;
- Inform the School if they identify hazardous handling activities;
- Take care to make sure their activities do not put others at risk.

39.1.7 Obviously, a large number of manual handling operations go on each day at the School. The intention is to target operations liable to present a risk of injury. It is this category which needs further specific assessment.

39.2 Training

39.2.1 Training in Manual Handling is organised by the Head of Estates on an annual basis or more often if required. Other staff who are identified as requiring training by the Director of Operations when risk assessments are carried out will also be provided. A record is kept of those who complete the training in the Training Files held by the Operations and Compliance Manager.

39.2.2 Training is organised in to 2 levels:

1. The Line Manager or Supervisor's level. This is oriented towards risk assessment and supervision.
2. The individual employee, who might lift at work. This is primarily practical instruction on how to lift.

40 Driving at Work

40.1 Please see separate policy [Driving for Work](#)

41 Work with Display Screen Equipment

42.1.1 The Health and Safety Display Screen Equipment (DSE) Regulations 1992 cover all display screen equipment (visual display units/terminals) but the majority of requirements apply only to those employees known as "users". Further guidance from the HSE is available in their leaflet "[Working with display screen equipment \(DSE\)](#)" (reference INDG36(rev4), published 04/13).

42.1.2 An **assessment** must be carried out on the workstations of each user and this should be recorded. The assessment should not only cover the workstation itself (VDU plus furniture), but the environment (lighting, space, noise, humidity etc.) and the interface between the computer and operator/user.

42.1.3 Once an assessment has been carried out, remedial action, if appropriate, should be taken.

42.2 Eye Sight Tests

42.2.1 The School has enrolled all staff in the Health Cash Plan, which provides an annual contribution towards eye tests and prescription glasses.

42.3 Training

42.3.1 All users must be provided with Health and Safety training about their equipment. In practical terms, there is likely to be considerable overlap between the training on the uses of DSE's, the software etc. and the Health and Safety training. Information on the possible effects on health is provided (upper limb pain, fatigue and stress etc.) via the Operations page of the staff handbook.

42.4 Radiation

42.4.1 There is no radiation problem associated with display screens and anti-radiation screens are totally unnecessary; however, there may be occasions where anti-glare screens are of benefit. This would be identified during DSE assessment, which staff may request at any time.

42.5 Health Problems

42.5.1 No evidence has been found to suggest that cataracts, epilepsy or facial dermatitis are caused by DSE. DSE work must not be introduced to those who suffer from photo-epilepsy before seeking medical advice.

42.5.2 The HSE has confirmed that it is safe to work with DSE whilst pregnant.

42.6 Equipment

42.6.1 All new DSE installed must comply with Regulations and those responsible for purchase (IT Manager) should be familiar with the guidance to the Regulations.

43 Training and Instruction

43.1.1 The provision of appropriate Health and Safety information, instruction and training (followed by appropriate supervision) is essential to a safe system of work. Training is mentioned in many of the safety policy documents, but not all our needs have necessarily been identified. Induction training must be provided for all employees and pupils. Thereafter, employees and pupils must be competent in the tasks required of them or must be adequately controlled by competent persons.

43.1.2 Where training and instruction is an identified need, it should be provided. Some specific forms of training are required by statute.

43.1.3 Examples of these are:

1. Training for the users of woodworking machinery
2. Training in Manual Handling
3. Training in the operation of prescribed dangerous (catering) machines
4. Training of Maintenance staff on their awareness and approach to the Asbestos in the School's buildings.

43.1.4 Written information should also be provided where necessary.

43.2 Records

43.2.1 Training records are maintained in the following locations:

- On a training record file held in each department, with an overview held by the Operations and Compliance Manager
- Mandatory training is held on the individual's personnel file

43.2.2 It is the responsibility of heads of department to:

1. Identify training needs through the appraisal system
2. Organise training / certification
3. Keep written records of certification
4. Advise colleagues on safe systems of work
5. Mention requirements in local guidelines

44 The Health and Safety Consultation with Employees Regulations (HSCER)

- 44.1 Any employee of the School is entitled to belong to a trade union or trade unions if they wish. However, union representatives are not appointed as safety representatives for the purposes of the Safety Representatives and Safety Committees Regulations 1977.
- 44.2 All employees will therefore be consulted on matters of Health and Safety in accordance with the procedure under the HSCER 1996 (as amended). Further details are contained in [“Consulting employees on health and safety, A brief guide to the law - Consulting employees”](#) (Reference is INDG232(rev2), published 04/13).
- 44.3 The usual channel for an employee to raise a matter concerning Health and Safety, or being consulted about such matters, is through their line manager, usually the head of the department in which the employee works. They may also report issues through the online Helpdesk.
- 44.4 At least one departmental meeting each year will have Health and Safety as an agenda item, but employees may raise matters to be consulted about at any time.
- 44.5 A mechanism for an employee to raise a matter of Health and Safety concern is already in place; however, they may in addition ask for a matter to be raised at the termly meeting of the Health and Safety Committee by contacting the Director of Operations.
- 44.6 Consultation with employees will be carried out on matters to do with their Health and Safety at work, including:
- A change, which may substantially affect their Health and Safety at work, for example in procedures, equipment or ways of working
 - The employer’s arrangements for getting competent people to help him or her satisfy Health and Safety laws
 - The information that employees must be given on the likely risks and dangers arising from their work, measures to reduce or get rid of these risks and what they should do if they have to deal with a risk of danger
 - The planning of Health and Safety training
 - The health and safety consequences of introducing new technology
- 44.7 Employees will be given enough information to allow them to take a full and effective part in the consultation process.
- 44.8 Consultation is via the established Health and Safety Committee:
- Agendas will be readily available for input from all categories of staff, both teaching and non-teaching, and minutes will be made available on request.
 - It will be clear that any employee who wishes to have an input will be given ample time and opportunity to do so.

45 Stress Management

- 45.1 The Health and Safety Executive define stress as “the adverse reaction people have to excessive pressure or other types of demand placed on them”. This makes an important distinction between pressure, which can be a positive state if managed correctly, and stress which can be detrimental to health.
- 45.2 Stress is not an illness but sustained over some time it can lead to mental and/or physical illness and can adversely affect an individuals’ performance or behaviour. There is an important distinction between working under pressure and experiencing stress. Certain levels of pressure are acceptable and normal in every job. They can improve performance, enable individuals to meet their full potential and provide a sense of achievement and job satisfaction. However, when the pressure becomes excessive, it produces stress.
- 45.3 Pressures outside the workplace (whether the result of unexpected or traumatic events such as accidents, illness, bereavement, family breakdown or financial worries) can result in stress. They can also compound normal workplace pressures.
- 45.4 The School recognises that what triggers stress, and the capacity to deal with stress, varies from person to person. Individuals react to similar situations in different ways. By way of examples, causes of work-related stress may include:
- Demands – e.g. where the individual cannot cope with the demands of their job;
 - Control – e.g. where an individual cannot control the way they do their work;
 - Support – e.g. where the individual does not receive enough information or support;
 - Relationships – e.g. where there are difficulties with relationships at work, or they feel they are being bullied or harassed;
 - Role – e.g. where an individual doesn’t fully understand their role or responsibilities;
 - Change- e.g. where an individual is not engaged when the School is undergoing a period of change.
- 45.5 Signs of stress will vary from individual to individual but common signs of stress may include:
- Increased sickness absence;
 - Decreased performance;
 - Arriving later for work;
 - Mood swings;
 - Being withdrawn;
 - Loss of motivation, commitment and confidence;
 - Feeling negative;
 - Being indecisive;
 - Feeling isolated;
 - Feeling nervous;
 - Tearfulness;
 - Reduced patience;
 - Reduced tolerance of others;
 - Being unable to concentrate;
 - Eating more or less than usual;
 - Smoking, drinking or taking drugs to “cope”;

- Having difficulty sleeping.

45.6 The School is committed to identifying, tackling and preventing the causes of work-related stress and to providing appropriate support and consideration to staff suffering from stress, on a confidential basis where appropriate including:

- Promoting a culture of open communication, participation and encouragement;
- Through training, effective planning and allocation of workloads and ensuring feedback is provided on performance; the School is keen for staff to develop their skills and confidence and to feel able to raise any concerns they have about their work or working environment;
- An opportunity to discuss these aspects during the appraisal process;
- Providing a workplace free from harassment, bullying and victimisation;
- Addressing violence, aggression and other forms of inappropriate behaviour through disciplinary action;
- Ensuring risk assessments include or specifically address workplace stress;
- Facilitating requests for flexible working where reasonably practicable following the School's [Flexible Working Policy](#);
- Monitoring holidays to ensure staff are using their entitlement;
- Providing support and services for staff affected by or absent by reason of stress such as, an employee assistance programme, occupational health via the in-School medical unit, access to an experience pastoral team and mental health first aiders.

45.7 Recognition of stress as a genuine problem requires line management support and action. All managers have a responsibility to recognise potential issues of work-related stress in the staff they manage and have a responsibility to:

- Participate in the culture of open communication;
- Ensure that the staff they line manage receive training to undertake their duties;
- Ensure staff are given meaningful developmental opportunities;
- Effectively plan and allocate workloads and provide feedback on performance;
- Monitor workloads and reallocate work where necessary to prevent overload or underutilization;
- Discourage work related contact with staff outside normal working hours or whilst on holiday;
- Monitor working hours and overtime to ensure no member of staff is overworking;
- Monitor holidays to ensure staff are taking their entitlement;
- Ensure bullying and harassment is not tolerated within their area;

- j) Be vigilant with members of staff suffering stress outside of work (e.g. bereavement or separation) and offer them additional support;
- k) Ensure that the staff they manage understand the standards of behaviour expected of them and others and act on behaviour that falls below those standards;
- l) Carry out and implement (or organise the implementation of any) recommendations of risk assessments;
- m) Ensure personal data of staff members, including information about their mental health, is handled in accordance with data protection principles and the School's policies dealing with privacy.

45.8 If you believe you are suffering from stress, in the first instance you should discuss this with your Line Manager. If you feel unable to do so, you should contact HR or a member of the pastoral team. Once an issue affecting your health comes to the attention of one of the above, steps will be taken by the School to address that issue. Those steps may include for example, referral for medical advice including guidance on any reasonable adjustments that may assist the member of staff, a review of role and responsibilities. A stress management risk assessment will be carried out to ensure that any necessary and appropriate action is implemented to support the member of staff. Any employee who is absent due to stress should follow their usual sickness absence reporting procedure.

45.9 Confidentiality is an important part of Stress Management. Every member of staff is responsible for observing the high level of confidentiality that is required, whether they are suffering from stress, supporting a colleague who is suffering from stress because they are otherwise involved in the operation of a policy or procedure dealing with stress. Breach of confidentiality may give rise to disciplinary action in accordance with the School's Disciplinary Policy and Procedure. However, there are occasions when matters reported by a member of staff suffering from stress or mental ill health may have to be put to third parties. For example, where duties need to be reallocated within a team or where, as the result of reported bullying or misconduct, a disciplinary investigation and/or proceeding take place. If this is the case, matters will be discussed with the member of staff concerned and an appropriate means of communication agreed before any action is taken.

46 Security and Lone Working

46.1 A full copy of the School's Security, Access Control, Workplace Safety and Lone Working Policy is held in the Staff Handbook which can be accessed online.

47 Home Working

47.1 Where flexible working arrangements are in place or become necessary (e.g. during a pandemic) staff will continue to be guided by the School's [ICT Acceptable Use Policy](#)

47.2 Staff intending to work from home should ensure that they conduct a Display Screen Equipment assessment in advance. Guidance can be found at <https://www.hse.gov.uk/msd/dse/>

48 Pregnancy and New Mothers

48.1 A member of staff that is a new or expectant mother should notify their line manager as soon as practicable. A new mother is defined as a member of staff who has given birth within the last 6 months.

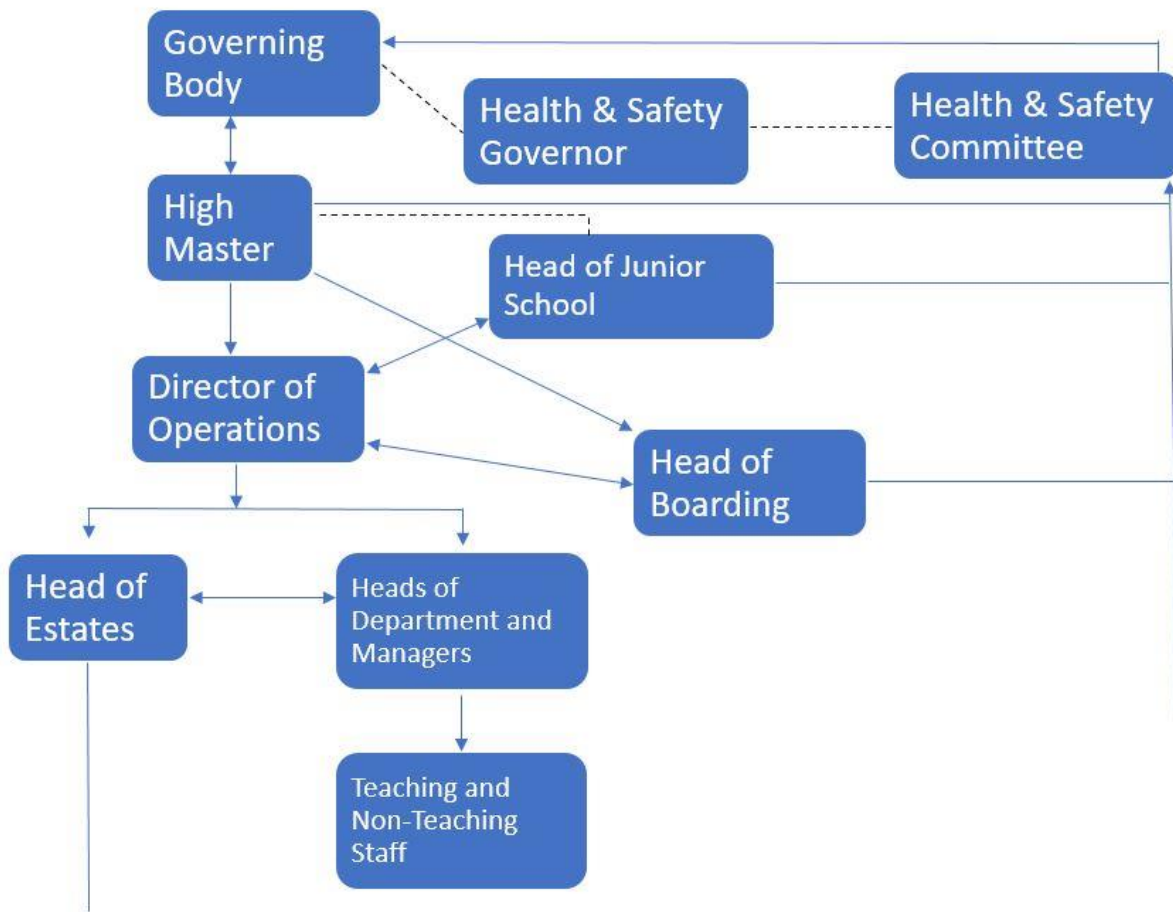
48.2 The Director of Operations is responsible for ensuring that risk assessments are undertaken, and appropriate controls are in place to manage infection risks in line with the requirements set out in the [Infection/Outbreak Control Policy](#)

48.3 The staff member's line manager should review the relevant risk assessments with the relevant staff to ascertain whether further controls are required. If necessary, a specific risk assessment and DSE assessment should be carried out for the new/expectant mother.

48.4 The following risks will be considered when completing the risk assessment:

1. Working with hazardous substances
2. Stressful environments
3. Movement around the site (including stairs and distances between classrooms etc.)
4. Doing duties that involve physical effort which might be too arduous;
5. Standing for long periods
6. Inherent risks in certain departments, e.g. PE, Science
7. Manual Handling
8. Working in a confined working space
9. Using an unsuitable workstation
10. Infectious diseases
11. The provision of appropriate sanitary and rest facilities.

Appendix 1 - Organisational Chart for the Management of Health and Safety



Appendix 2 – List of consultants engaged to provide specialist advice

Specialist Area	Consultant
Health & Safety Consultants	Judicium
Specialist Support for DT and Science Departments	CLEAPSS
RPA	Oxford Radiation Consultants
Fire Safety	British Fire Advisory Services Ltd
Fire Alarm Testing	Fire System Solutions Ltd
Asbestos	Bsafe
Legionella / Water Quality	A1 Water Treatment
Lifts	Orona Lifts
TR19 Kitchen Ducting	Ventilation Hygiene Cleaning Ltd
Occupational Health	Fleet Street Clinic
Employee Assistance Programme	Healthshield