

CORPORATE HEALTH & SAFETY POLICY

The Rivers C of E Academy Trust

Committee:	Audit, Risk and Compliance Committee
Approved on:	August 2024 – see Every
Next review date:	August 2025

STATEMENT OF INTENT

Through this policy the trust devolves the employer responsibilities for operational Health and Safety (H&S) management (including fire safety management) to academy schools (this term also refers to nurseries, pre-schools and The Rivers Teaching Alliance). This recognises the autonomy of schools within the trust. The trust will provide such systems and support to the schools as is needed to ensure the health and safety of pupils and staff. The trust will also monitor schools H&S performance against legislative compliance and applicable standards. Schools failing to comply or meet required standards will be required to implement such measures as are necessary to remedy the deficiencies from their own budgets.

Legislative Requirements

This policy has been developed in accordance with, and will be implemented alongside, the following legislation, regulations, approved code of practice and statutory instruments. This list is not exhaustive.

Health and Safety at Work Act 1974
Control of Asbestos Regulations
Control of Substances Hazardous to Health (COSHH)
Electricity at Work Regulations
Health and Safety (Display Screen Equipment) Regulations
Health and Safety (First-Aid) Regulations
Lifting Operations and Lifting Equipment Regulations
Manual Handling Operations and Regulations
Personal Protective Equipment
Reporting of Injuries, Diseases and Dangerous Occurrences Regulations
The Management of Health and Safety at Work Regulations 1999
The Regulatory Reform (Fire Safety) Order 2005
Work at Height Regulations
Approved Code of Practice (ACOP) L8 Legionnaires' Disease: The Control of Legionella Bacteria in Water Systems

1. STRATEGY

The trust's strategy for the leadership and management of H&S in schools is to devolve operational accountability and responsibility. The basis for this strategy is that:

- Schools are autonomous in terms of their activities and the use, maintenance and repair of their premises; and,
- Schools have control over their delegated budgets and are best placed to determine the legally required 'reasonably practicable' measures to reduce H&S risks.

The trust retains the overall statutory duties as the 'employer' and 'owner of premises' and will provide support and systems to facilitate the leadership and management of H&S in schools. Schools are expected to apply pragmatic, proportional and sensible measures to manage H&S risks:

- Eliminate – By not doing an activity or finding an alternative way of achieving the same result at lower risk, schools must be able to justify their approach if it impacts on pupil learning;
- Reduce – By introducing sufficient measures to lower risk to an acceptable level;
- Transfer – By purchasing the services of the trust or another supplier to manage the risk for the school; or,
- Accept – By deciding the level of risk is tolerable and needs no further reduction.

The trust will audit and inspect schools to establish compliance with legislation and standards and to determine the management of risks is suitable and sufficient. Schools are expected to budget and pay for any measures necessary to manage H&S risks to an acceptable level.

2. ORGANISATIONAL ROLES AND RESPONSIBILITIES

2.1 The Trust

For academy schools the trust is the employer and has the statutory duty for the safety of employees, pupils and others affected by school activities. The H&S duties for the trust in respect of these schools are:

- Under the Health and Safety at Work Act 1974, ensure compliance with health and safety legislation – monitor and initiate action if necessary;
- Ensure an active and proportionate approach to managing health, safety and welfare risks to the school workforce and pupils;
- Ensure that procedures are in place to effectively manage H&S;
- Support the Headteacher to develop a school health and safety policy and provide procedures, standards and guidance;
- Provide health and safety training and information to the school workforce, so that they understand their responsibilities;
- Ensure that adequate resources are provided for the provision of appropriate information, instruction and training of key personnel;
- Ensure that those delegated health and safety tasks, e.g. risk assessment, are competent to carry them out;
- Work with the Headteacher to support and strengthen H&S leadership; and,
- Ensure competent H&S advice is available when required.

Ideally, the nominated lead for within the trust will hold a recognised level 2 or level 3 H&S qualification, e.g. BSC Supervising Staff Safety, IOSH Managing Safety, NEBOSH Certificate, CIEH Level 3 or similar. The Operations Manager in The Rivers C of E Academy Trust holds an IOSH qualification.

2.2 Headteachers

Headteachers need to demonstrate leadership of Health and Safety both for the management of the risks and to act as a positive influence on the development of children's understanding of risk. They are responsible for implementing Health and Safety legislation in their school. They should:

- Put into place an effective system for managing and monitoring H&S risks;
- Ensure staff, pupils and visitors are aware of the precautions and protective measures required for managing H&S risks;
- Ensure that where H&S has been delegated, that staff have the authority, capacity, competency, resources and training to take on these responsibilities and that clear lines of accountability are established and communicated;
- Ensure that all employees (including themselves) have H&S information and training relevant to their role and the risks in the school;
- Considering nominating a person to act as the focal point for H&S within the school; and,
- Put into place effective systems for communicating and consulting about H&S to staff and employee / union H&S representatives.

2.3 Business Managers / Office Managers

A Business Manager, Finance Officer or Office Manager may be the nominated lead for H&S and as such will have the day-to-day responsibility for H&S within the school and be required to implement the Headteachers' responsibilities as detailed above. The whole school responsibilities may also include:

- That H&S is included in the procurement of goods and services;
- The selection of contractors and their management whilst on site;
- The recording / reporting of accidents and incidents;
- Organising H&S training for school staff; and,
- Preparing H&S reports for the Headteacher

2.4 Teachers and Support Staff

All of a school's workforce have a role in the management of H&S risks. All staff will:

- Take reasonable care of their own H&S and that of others affected by their work;
- Cooperate with the school to keep the workplace safe;
- Not interfere with, or misuse anything provided for H&S;
- Carry out activities and use equipment in accordance with training and instructions; and,
- Inform the school (or trust) of any serious risks.

2.5 School Premises

The devolution of the operational management of H&S includes providing a safe working environment for staff and pupils. Support for the management of premises health and safety risks may be provided by agents appointed by the trust, or another provider at the school's discretion (funded from the school budget). However, this support does not extend to the day-to-day management of risks in school premises. Schools are required to allocate resources to carry out a range of frequent and regular tasks. Full details of the requirements for managing premises is contained in Good Estate Management for Schools (GEMS).

3 ARRANGEMENTS

3.1 General

Schools will undertake to control hazards and to reduce risks, so far as is reasonably practicable, in order to minimise the impact on staff, pupils and anyone else affected by school activities. Schools are required to implement sufficient arrangements to proportionately and sensibly manage H&S risks. The trust, through a combination of in-house and outsourced service agreements, can provide services and support to schools to fulfil their responsibilities:

- Competent H&S advice, information and guidance;
- An electronic H&S management system for reporting events;

- Support for the management and planning of visits and learning outside the classroom activities including external SLA support through B&S Educational Systems and Training.
- A portfolio of school focused training;
- Statutory and pseudo-statutory inspections, surveys and testing; and,
- Independent auditing of schools H&S performance (including RPA audit).

Schools are required to use the trust's systems and support but may choose to make additional arrangements should they consider further support is required. It must be remembered that the trust has the statutory duty for H&S in schools and will intervene where necessary to ensure the safety of pupils and staff. Schools may be charged for the introduction of any measures the trust has to implement to comply with legislation.

3.2 Hazard identification, risk assessment and controls

Risk assessment is a dynamic process of continuous improvement whereby risks are progressively eliminated or reduced to an acceptable level. ALL work should be designed and planned to minimise risks. Care must be taken that changes to activities or how they are organised or provided or alterations to work practices do not introduce additional risks. The trust expects schools to apply a pragmatic, proportional, and sensible approach to risk management.

Schools will ensure they have methods and processes in place to identify health and safety hazards, e.g. hazard inspection tours. All identified hazards will be subjected to a risk assessment, and protective and preventative measures implemented to control the hazards and reduce risks to an acceptable level. Risks will be ranked and prioritised and all significant risks will be recorded by formal assessment. As a general guide:

- Primary schools and 'traditional' classrooms in other schools and colleges are typically lower risk environments;
- Arts & Drama, Design & Technology, Music suites, Science and Sports will have higher risks; and,
- Outdoor activities, managing contractors and vehicle movements will have the highest risks.

For high-risk activities and unusual risks, particularly involving contractors, managers will ensure that written operational guidance in the form of a Safe System of Work (SSOW) or Method Statement is provided in addition to the required risk assessments. Where there is no other method of mitigating the risk, e.g. entry into a hazardous area, hot works (flame cutting and welding), work with asbestos and work at height etc., a Permit-To-Work (PTW) system may be used.

3.3 Legal requirements

The Headteacher may devolve H&S accountability and responsibilities to business managers, teachers and other staff by means of a school specific H&S policy. A copy of the policy will be given to each member of staff to ensure they understand their responsibilities for H&S and the arrangements the school has made to manage H&S. Trust and school policies, procedures and work instructions shall be followed to ensure

compliance with legislation. Best practice shall be followed where no legislation or procedure exists.

3.4 Objectives and programme

Schools are required to comply with legislation and standards. Performance against these objectives will be monitored by audits and sampling (audits of specific areas). Schools failing to meet the objectives will be given a programme of recommended actions.

3.5 Competence, training and awareness

All staff should be competent to undertake their duties. Schools need to identify the H&S training requirements staff require to undertake their devolved responsibilities. H&S training is available from the trust or wider marketplace.

There is a mandatory requirement for schools to deliver annual fire training to all staff. This training must be relevant to the site and include details of fire assembly points, evacuation and responsibilities. Each site should have at least one fire marshal. Fire marshal training should be renewed every three years.

3.6 Communication, participation and consultation

Schools are required to set up formal methods for communication H&S information to staff. They are required to have a Health and Safety information board to display information and messages. Termly health and safety meetings take place in each school; agendas include updates, consultation and monitoring.

Typical methods for disseminating H&S information are:

- School internet pages
- The trust SharePoint
- Every Education
- Internal paper and electronic magazines
- Staff email
- Microsoft Teams
- 'Priority' mailings
- The Staff Review process
- Line management and supervision
- 'Team talk' and other staff discussion forums
- Training courses to disseminate specific information on the implementation of policy, policy statements and procedures.

Schools will also establish methods of consultation with unions / employee representatives to distribute information and receive feedback about H&S issues.

3.7 Documents and document control

The trust will provide schools with general and school specific information via Every. Schools are also strongly recommended to refer to WCF Portal whose content is monitored and updated by WCC's internal H&S Team. Schools will be alerted by the WCF bulletin as to additions, reviews and updates to the content on the WCF Portal.

3.8 Operational control

H&S will be managed with equal priority to any other school activity.

3.8.1 People

Risks to school staff health will be managed. In practice this means:

- Recruiting people that have the fitness and health required to perform the job role
- Monitoring employee health during their working life, e.g. health surveillance where appropriate
- Intervening early when ill health affects fitness for work or work performance
- Providing clean, safe, healthy workplaces and working environments
- Flexible working arrangements for a good work-life balance
- Reasonable job demands
- Reasonable control over how work is planned and carried out
- Support to help employees do their job and fulfil their role within the school
- Promoting physical activity in the workplace
- Information, instruction and training.

Schools should commit to ensuring that, daily, employees and pupils return home at least as fit and healthy as when they came to work.

3.8.2 School activities

All activities will be assessed by the level of risk. The level of detail in a risk assessment should be proportionate to the risk and appropriate to the nature of the work. Insignificant risks can usually be ignored, as can risks arising from routine activities associated with life in general, unless the work activity compounds or significantly alters those risks. Risk assessments should only include what you could reasonably be expected to know - you are not expected to anticipate unforeseeable risks.

The recommended format for risk assessments is stored on Microsoft Teams – Premises Team.

3.8.3 Equipment and hazardous substances

Equipment will be purchased and used in accordance with the Provision of Work Equipment Regulations 1998. Staff using equipment shall be competent having been given suitable and sufficient information, instruction and training. No electrical equipment shall be used without being visually and electrically tested and passed as safe (Portable Appliance Test).

Hazardous substances (chemical and biological) will be assessed for their impact on pupil and staff health; following the instructions on the product or in the safety data sheets may be sufficient for the use of domestic (cleaning) products. Otherwise an exposure assessment as specified in the Control of Substances Hazardous to Health Regulations 2002 (as amended) is required.

3.8.4 Work environments

Schools will manage their premises to provide a safe and healthy environment:

- Statutory notices will be prominently displayed at the entrance to each building;
- Policies, procedures and guidance will be implemented for the management of school buildings and grounds, especially hazards such as asbestos, fire and water quality (legionella);
- All electrical equipment will be tested according to an appropriate schedule that includes both portable and fixed electrical equipment;
- Lifts and lifting equipment will be inspected and tested according to legislation;
- Playground equipment will be properly designed and constructed for the pupil age group, and inspected regularly; and,
- Suitable, sufficient and appropriate signage will be displayed for all hazards and in particular for fire and evacuation routes.

3.9 Emergency preparedness and response

All staff and pupil accidents involving injuries, violence, property damage and near misses will be recorded using the trust's systems (including systems provided by service agreements such as WCC MyCority Portal). Accidents reportable to the Health and Safety Executive may be subject to investigation; the school will be notified of this requirement by the trust's central team. Schools will be provided with regular statistics in order to monitor accidents.

Schools will prepare and keep current business plans for dealing with minor and major emergencies. These will include:

- First aid
- Evacuations (including Personal Emergency Evacuation Plans (PEEPs) for staff and pupils with mobility problems)
- Loss of utilities and heating
- Flooding
- Severe weather
- Release of a toxic substance
- Partial or full closure of the school
- Major incident on a school visit
- Cyber Incidents
- Death of a pupil or member of staff.

WCC can provide simple general instructions for dealing with such emergencies (Emergency Response Instruction Cards (ERICs)). Support for 'critical incidents' is the subject of a separate WCC SLA. The trust will work in partnership with schools and WCC

in order to deal with any major health events that might affect pupils and staff, e.g. pandemic.

4 MONITORING AND REVIEW

The trust central team will monitor the health and safety performance of schools and report to Trustees. The report will be based on a blend of proactive and reactive systems used by the team to monitor performance, including:

- The Every software compliance report
- Inspections
- Surveys
- Remedial work
- Event reporting
- Event investigation
- Claims monitoring
- Sickness absence data
- Occupational health statistics.

External audit may take place through HSE inspections.

The trust central team audit areas of health and safety compliance on a continual basis. These audits are designed to establish that:

- Appropriate management systems exist
- Appropriate testing is taking place
- Records are available
- Adequate systems are in place to assess, evaluate and control risks
- The results of risk assessments are implemented
- Any residual risk is within the resources of the school to mitigate.

This policy will be reviewed annually or whenever there is a significant change in legislation or the organisational structure.

5. VERSION CONTROL

Date	Version	Approved by	Title	Changes
28/09/18	1.0			Policy launch devolving H&S responsibilities to academy schools.
29/01/21	2.0			Format update
14/03/22	3.0			St Clement's Teaching School amended to St Clement's Teaching Alliance
25/11/22	4.0			Remove reference to School Improvement Boards (SIB)
Aug 23	5.0			Minor typo's
June 2024	6.0			2.1 Reference to qualification added to trust 3.1 SLA changed to current SLA provider 3.6 amended to include Microsoft Teams 3.7 amended to reflect H&S bulletin

				3.9 amended to include cyber incidents
August 2024	7.0			<p>Formatting errors</p> <p>Legislative requirements added</p> <p>Headteacher responsibilities reworded to add legislative requirements.</p> <p>Hazard identification updated to include management of contractors.</p> <p>3.6 Communication, participation and consultation – termly meetings added</p> <p>3.8 Operational Control – more detail on risk assessments added</p> <p>4. External audit through HSE inspections added.</p>