

Health and Safety Policy



THE EARLS HIGH SCHOOL
AD 1652

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Signature of LGB Chair

William White

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1. Aims

Our school aims to:

- Provide and maintain a safe and healthy environment
- Establish and maintain safe working procedures amongst staff, pupils and all visitors to the school site
- Have robust procedures in place in case of emergencies
- Ensure that the premises and equipment are maintained safely, and are regularly inspected

2. Legislation

This policy is based on advice from the Department for Education on health and safety in schools and the following legislation:

- [The Health and Safety at Work etc. Act 1974](#), which sets out the general duties employers have towards employees and duties relating to lettings
- [The Management of Health and Safety at Work Regulations 1992](#), which require employers to make an assessment of the risks to the health and safety of their employees
- [The Management of Health and Safety at Work Regulations 1999](#), which require employers to carry out risk assessments, make arrangements to implement necessary measures, and arrange for appropriate information and training
- [The Control of Substances Hazardous to Health Regulations 2002](#), which require employers to control substances that are hazardous to health
- [The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations \(RIDDOR\) 2013](#), which state that some accidents must be reported to the Health and Safety Executive and set out the timeframe for this and how long records of such accidents must be kept
- [The Health and Safety \(Display Screen Equipment\) Regulations 1992](#), which require employers to carry out digital screen equipment assessments and states users' entitlement to an eyesight test
- [The Gas Safety \(Installation and Use\) Regulations 1998](#), which require work on gas fittings to be carried out by someone on the Gas Safe Register
- [The Regulatory Reform \(Fire Safety\) Order 2005](#), which requires employers to take general fire precautions to ensure the safety of their staff
- [The Work at Height Regulations 2005](#), which requires employers to protect their staff from falls from height

The school follows [national guidance published by Public Health England](#) when responding to infection control issues.

This policy complies with our funding agreement and articles of association.

3. Roles and responsibilities

3.1. The Local Governing Board/Trust

The governing board/trust has responsibility for health and safety matters in the school, but will delegate day-to-day responsibility to The Head Teacher.

The governing board has a duty to take reasonable steps to ensure that staff and pupils are not exposed to risks to their health and safety. This applies to activities on or off the school premises.

The Stour Vale Academy Trust (SVAT), as the employer, also has a duty to:

- Assess the risks to staff and others affected by school activities in order to identify and introduce the health and safety measures necessary to manage those risks
- Inform employees about risks and the measures in place to manage them

- Ensure that adequate health and safety training is provided

3.2. Headteacher

The Headteacher is responsible for health and safety day-to-day. This involves:

- Implementing the health and safety policy
- Ensuring there is enough staff to safely supervise pupils
- Ensuring that the school building and premises are safe and regularly inspected
- Providing adequate training for school staff
- Reporting to the governing board on health and safety matters
- Ensuring appropriate evacuation procedures are in place and regular fire drills are held
- Ensuring that in their absence, health and safety responsibilities are delegated to another member of staff
- Ensuring all risk assessments are completed and reviewed
- Monitoring cleaning contracts, and ensuring cleaners are appropriately trained and have access to personal protective equipment, where necessary

The Head Teacher may delegate these responsibilities to the Health and Safety Coordinator for above day-to-day health and safety responsibilities.

3.3. School Leadership Team

This includes Deputy Heads, Assistant Heads, Curriculum Coordinators, Heads of Year, Heads of Department/Faculty, and Clerical Manager/Supervisors.

In addition to the general duties of staff, Supervisory staff will be directly responsible to the Head Teacher or a member of staff nominated by the Head Teacher, to have overall responsibility for the implementation and operation of the schools health and safety policy within their relevant department and areas of responsibility.

3.4. Health and Safety Coordinator

The nominated Health and Safety Coordinator is the School Business Manager. This involves;

- To assist the head teacher to plan, implement and assess the health and safety policy and organisational arrangements and regularly review the system of risk assessments as required by the relevant regulations.
- To assist the head teacher to regularly review the school Health and Safety Policy and Organisational arrangements.
- To ensure that members of staff are aware of and have access to the schools health and safety policy.
- To inform new or temporary staff of their health and safety responsibilities and duties and to provide the necessary information and advice for them to carry out their duties.
- To liaise with the head teacher and where appropriate, seek further advice on:
 - The implications of safety legislation, codes of practise and approved safe working procedures.
 - The health and safety aspects, affecting the design and layout of new and reorganised working areas.
 - The health and safety aspects of new plant, equipment, and personal protective clothing.
- To carry out periodic inspections, with departmental manager or premises and other work places, plant, tools, equipment and work activities, reporting to the head teacher and other managers who have responsibility for actioning health and safety reports.
- To assist management with the preparation of departmental safe working procedures and safety rules.
- To liaise, where appropriate, with the counsels Safety Officers, the HSE, West Midlands Fire Services and Fire Prevention Officers and Environmental Health Officers.
- To identify and recommend suitable health and safety training courses to enable staff to carry out their health and safety duties and maintain a record of staff attendance/certification.
- To support the investigation of accidents, dangerous occurrences and near misses occurring on the school premises and reporting the findings to the head teacher as appropriate.
- To regularly monitor:
 - The first aid procurement within the school including the availability of first aid equipment and trained staff

- The fire evacuation procedure within the school and arrange for regular fire drills to test the effectiveness of the procedure.
- Compliance with the control of substances hazardous to health regulations 2002 (COSHH).
- To attend, as appropriate, the committee of the governing body dealing with health and safety and to prepare agenda items and safety reports.
- To attend the committee of the school for dealing with health and safety and to prepare agenda items and safety report.
- To receive health and safety reports prepared by the school staff and to act upon them as appropriate.
- To support the head teacher to follow up and progress the actions of reports received from council safety officers, Health and Safety Executive inspectors, west midlands fire service officers, environmental health officers and other service providers.
- To advise the head teacher or heads of departments to STOP IMMEDIATELY any work processes, plan or equipment (including contractor operations) where it is considered there is a serious breach of health and safety legislation, of where a hazard has been created likely to affect the safety of staff, pupils or visitors to the school.

3.5. Class Teachers

Class teachers are responsible to:

- Exercise effective supervision on their pupils
- Understand the fire evacuation procedures for the school and assembly points to evacuate to
- Understand the first aid and accident and incident reporting procedures and to comply with them
- Follow the health and safety measures identified for their areas of teaching and any relevant safety procedures eg CLEAPSS
- Personally follow safe working procedures and ensure pupils follow good examples of safe working
- Ensure the use of protective equipment and guarding as required.
- Report to the head or head of department any safety issues or omissions identified so that they can be rectified
- Only work with equipment supplied by the school
- Ensure all accidents incidents and near misses are reported through the normal channels.

3.6. Employees (including temporary and voluntary)

All employers have a duty to carry out their work with due regard for the health and safety of themselves, other employees, pupils and the general public and to observe health and safety requirements relevant to their activities. Employees will:

- Cooperate with the head teacher and school leadership team so as to enable them to carry out their statutory duties and responsibilities effectively
- Report to their head of department hazards and near miss incidents which could result in injury
- Report to their heads of department all accidents, however minor, from which an injury sustained or plan or equipment damaged.
- Report to their head of department all incidents of violence including verbal, physical, racial, sexual abuse.
- Cooperate in the investigation of accidents or incidents with the object to preventing a recurrence and with any statutory duty placed on the school leadership team.
- Undertake their duties in accordance with their training, instruction and school policy.
- Use all machinery, equipment, dangerous substances and safety devices provided in accordance with training and instruction received.
- Attend all training courses and briefings sessions required by their head of department and schools policy.

3.7. Pupils and parents

Pupils and parents are responsible

- Complying with school rules and procedures and any instructions given in an emergency situation
- Taking reasonable care of themselves and others
- Cooperating with class teachers and other school staff

- Using equipment and substances in the manner in which they are instructed
- Making full use of personal protective equipment provided for them to use when it is required
- Observe standards of dress consistent with safety and hygiene requirements
- Report to their teacher/Headteacher anything they believe to be harmful or dangerous

3.8. Appointed Health & Safety Officer

The Health and Safety Officer is responsible for providing advice and support to the school/academy on all aspects relating to Health and Safety.

3.9. Health and Safety Representative

The Governing Body and Headteacher recognise the role of the safety representative and will support this role by encouraging safety representatives to investigate accidents and potential hazards where it is safe to do so, pursue employee complaints and be involved in school safety inspections.

3.10. Contractors

Contractors will agree health and safety practices with the Headteacher before starting work. Before work begins the contractor will provide evidence that they have completed an adequate risk assessment of all their planned work.

4. Site security

The Facilities Manager and site team are responsible for the security of the school site in and out of school hours. They are responsible for visual inspections of the site, and for the intruder and fire alarm systems. The oncall Facilities Lead is key holders and will respond to an emergency.

5. Fire

5.1. Emergency exits, assembly points and assembly point instructions are clearly identified by safety signs and notices. Fire risk assessment of the premises will be reviewed regularly.

5.2. Emergency evacuations are practised at least once a term.

5.3. The fire alarm is a loud continuous bell.

5.4. Fire alarm testing will take place once a week.

5.5. New staff will be trained in fire safety and all staff and pupils will be made aware of any new fire risks.

5.6. Any staff or visitors leaving the premises during the school day should sign-out at main reception and sign-in on returning to school.

5.7. In the event of a fire:

5.7.1. The alarm will be raised immediately by whoever discovers the fire and emergency services contacted. Evacuation procedures will also begin immediately

5.7.2. Fire extinguishers may be used by staff only, and only then if staff are trained in how to operate them and are confident they can use them without putting themselves or others at risk

5.7.3. Staff and pupils will congregate at the assembly point. This is the cricket pitch.

5.7.4. Form tutors/class teachers will take a register of pupils, which will then be checked against the attendance register of that day

5.7.5. Reception staff will take a register of visitors.

5.7.6. Staff and pupils will remain outside the building until the emergency services or Headteacher say it is safe to re-enter

5.7.7. The school will have special arrangements in place for the evacuation of people with mobility needs and fire risk assessments will also pay particular attention to those with disabilities.

6. Control of Substances Hazardous to Health (COSHH)

Schools are required to control hazardous substances, which can take many forms, including:

- Chemicals
- Products containing chemicals
- Fumes
- Dusts
- Vapors
- Mists
- Gases and asphyxiating gases
- Germs that cause diseases, such as leptospirosis or legionnaires disease

Control of substances hazardous to health (COSHH) risk assessments are completed by Facilities Manager (for staff use) and/or Head of Faculty (for student use via support from CLEAPS) and circulated to all employees who work with hazardous substances. Staff will also be provided with protective equipment, where necessary.

Our staff use and store hazardous products in accordance with instructions on the product label. All hazardous products are kept in their original containers, with clear labelling and product information.

Hazardous products will be stored in locked cupboards, accessible by staff only.

Any hazardous products are disposed of in accordance with specific disposal procedures.

Emergency procedures, including procedures for dealing with spillages, are displayed near where hazardous products are stored and in areas where they are routinely used.

6.1. Gas safety

- 6.1.1. Installation, maintenance and repair of gas appliances and fittings will be carried out by a competent Gas Safe registered engineer
- 6.1.2. Gas pipework, appliances and flues are regularly maintained
- 6.1.3. All rooms with gas appliances are checked to ensure that they have adequate ventilation

6.2. Legionella

- 6.2.1. A water risk assessment is carried out monthly by an external contractor. The Facilities Manager ensures operational controls are identified, conducted and recorded in the school's water log book by the contractor.
- 6.2.2. This risk assessment will be reviewed biennially and when significant changes have occurred to the water system and/or building footprint
- 6.2.3. The risks from legionella are mitigated by the following:
 - 6.2.3.1. temperature checks
 - 6.2.3.2. heating of water
 - 6.2.3.3. disinfection of showers

6.3. Asbestos

- 6.3.1. Staff are informed on the hazards of asbestos, the location of any asbestos in the school and the action to take if they suspect they have disturbed it
- 6.3.2. Arrangements are in place to ensure that contractors are made aware of any asbestos on the premises and that it is not disturbed by their work
- 6.3.3. Contractors will be advised that if they discover material which they suspect could be asbestos, they will stop work immediately until the area is declared safe
- 6.3.4. The record is kept of the location of asbestos that has been found on the school site

7. Equipment

All equipment and machinery is maintained in accordance with the manufacturer's instructions. In addition, maintenance schedules outline when extra checks should take place

When new equipment is purchased, it is checked to ensure that it meets appropriate educational standards

All equipment is stored in the appropriate storage containers and areas. All containers are labelled with the correct hazard sign and contents

7.1. Electrical equipment

- 7.1.1. All staff are responsible for ensuring that they use and handle electrical equipment sensibly and safely
- 7.1.2. Any pupil or volunteer who handles electrical appliances does so under the supervision of the member of staff who so directs them
- 7.1.3. Any potential hazards will be reported to Facilities Team immediately
- 7.1.4. Permanently installed electrical equipment is connected through a dedicated isolator switch and adequately earthed
- 7.1.5. Only trained staff members can check plugs
- 7.1.6. Where necessary a portable appliance test (PAT) will be carried out by a competent person
- 7.1.7. All isolators switches are clearly marked to identify their machine
- 7.1.8. Electrical apparatus and connections will not be touched by wet hands and will only be used in dry conditions
- 7.1.9. Maintenance, repair, installation and disconnection work associated with permanently installed or portable electrical equipment is only carried out by a competent person

7.2. PE equipment

- 7.2.1. Pupils are taught how to carry out and set up PE equipment safely and efficiently. Staff check that equipment is set up safely.
- 7.2.2. Any concerns about the condition of the gym floor or other apparatus will be reported to the Facilities Team.

7.3. Display screen equipment

- 7.3.1. All staff who use computers daily as a significant part of their normal work have a display screen equipment (DSE) assessment carried out. 'Significant' is taken to be continuous/near continuous spells of an hour or more at a time
- 7.3.2. Staff identified as DSE users are entitled to an eyesight test for DSE use upon request, and at regular intervals thereafter, by a qualified optician (and corrective glasses provided if required specifically for DSE use)

7.4. Specialist equipment

- 7.4.1. Parents are responsible for the maintenance and safety of their children's wheelchairs. In school, staff promote the responsible use of wheelchairs.

8. Lone working

8.1. Lone working may include:

- Late working
- Home or site visits
- Weekend working
- Site manager duties
- Site cleaning duties
- Working in a single occupancy office/classroom

- 8.2. Potentially dangerous activities, such as those where there is a risk of falling from height, will not be undertaken when working alone. If there are any doubts about the task to be performed then the task will be postponed until other staff members are available.
- 8.3. If lone working is to be undertaken, a colleague, friend or family member will be informed about where the member of staff is and when they are likely to return.
- 8.4. The lone worker will ensure that they are medically fit to work alone.
- 8.5. There is no general legal prohibition on working alone. However, a risk assessment of lone working tasks must be carried out.

9. Working at height

- 9.1. We will ensure that work is properly planned, supervised and carried out by competent people with the skills, knowledge and experience to do the work.
- 9.2. In addition:
 - The Facilities Manager retains ladders for working at height
 - Pupils are prohibited from using ladders
 - Staff will wear appropriate footwear and clothing when using ladders
 - Contractors are expected to provide their own ladders for working at height
 - Before using a ladder, staff are expected to conduct a visual inspection to ensure its safety
 - Access to high levels, such as roofs, is only permitted by trained persons

10. Manual handling

- 10.1. It is up to individuals to determine whether they are fit to lift or move equipment and furniture. If an individual feels that to lift an item could result in injury or exacerbate an existing condition, they will ask for assistance.
- 10.2. The school will ensure that proper mechanical aids and lifting equipment are available in school, and that staff are trained in how to use them safely.
- 10.3. Staff and pupils are expected to use the following basic manual handling procedure:
 - 10.3.1. Plan the lift and assess the load. If it is awkward or heavy, use a mechanical aid, such as a trolley, or ask another person to help
 - 10.3.2. Take the more direct route that is clear from obstruction and is as flat as possible
 - 10.3.3. Ensure the area where you plan to offload the load is clear
 - 10.3.4. When lifting, bend your knees and keep your back straight, feet apart and angled out.
 - 10.3.5. Ensure the load is held close to the body and firmly. Lift smoothly and slowly and avoid twisting, stretching and reaching where practicable

11. Off-site visits

When taking pupils off the school premises, we will ensure that:

- Risk assessments will be completed where off-site visits and activities require them
- All off-site visits are appropriately staffed
- Staff will take a school mobile phone/radio, a portable first aid kit, information about the specific medical needs of pupils along with the parents' contact details
- There will always be at least one first aider on school trips and visits

12. Lettings

This policy applies to lettings. Those who hire any aspect of the school site or any facilities will be made aware of the content of the school's health and safety policy, and will have responsibility for complying with it.

13. Violence at work

- 13.1. We believe that staff should not be in any danger at work, and will not tolerate violent or threatening behaviour towards our staff.
- 13.2. All staff will report any incidents of aggression or violence (or near misses) directed to themselves to their line manager/Headteacher immediately. This applies to violence from pupils, visitors or other staff.

14. Smoking

Smoking is not permitted anywhere on the school premises.

15. Infection Prevention and Control

We follow national guidance published by Public Health England when responding to infection control issues. We will encourage staff and pupils to follow this good hygiene practice, outlined below, where applicable.

15.1. Hand washing

- 15.1.1. Wash hands with liquid soap and warm water, and dry with paper towels
- 15.1.2. Always wash hands after using the toilet, before eating or handling food, and after handling animals
- 15.1.3. Cover all cuts and abrasions with waterproof dressings

15.2. Coughing and sneezing

- 15.2.1. Cover mouth and nose with a tissue
- 15.2.2. Wash hands after using or disposing of tissues
- 15.2.3. Spitting is discouraged

15.3. Personal protective equipment

- 15.3.1. Wear disposable non-powdered vinyl or latex-free CE-marked gloves and disposable plastic aprons where there is a risk of splashing or contamination with blood/body fluids (for example, nappy or pad changing)
- 15.3.2. Wear goggles if there is a risk of splashing to the face
- 15.3.3. Use the correct personal protective equipment when handling cleaning chemicals
- 15.3.4. The wearing of face coverings in line with advice received from PHE and DMBC.

15.4. Cleaning of the environment

Clean the environment frequently and thoroughly

15.5. Cleaning of blood and body fluid spillages

- 15.5.1. Clean up all spillages of blood, faeces, saliva, vomit, nasal and eye discharges immediately and wear personal protective equipment
- 15.5.2. When spillages occur, clean using a product that combines both a detergent and a disinfectant and use as per manufacturer's instructions. Ensure it is effective against bacteria and viruses and suitable for use on the affected surface
- 15.5.3. Never use mops for cleaning up blood and body fluid spillages – use disposable paper towels and discard clinical waste as described below
- 15.5.4. Make spillage kits available for blood spills

15.6. Laundry

- 15.6.1. Wash laundry in a separate dedicated facility
- 15.6.2. Wash soiled linen separately and at the hottest wash the fabric will tolerate
- 15.6.3. Wear personal protective clothing when handling soiled linen
- 15.6.4. Bag children's soiled clothing to be sent home, never rinse by hand

15.7. Clinical waste

- 15.7.1. Always segregate domestic and clinical waste, in accordance with local policy
- 15.7.2. Used nappies/pads, gloves, aprons and soiled dressings are stored in correct clinical waste bags in foot-operated bins

- 15.7.3. Remove clinical waste with a registered waste contractor
- 15.7.4. Remove all clinical waste bags when they are two-thirds full and store in a dedicated, secure area while awaiting collection

15.8. Animals

- 15.8.1. Wash hands before and after handling any animals
- 15.8.2. Keep animals' living quarters clean and away from food areas
- 15.8.3. Dispose of animal waste regularly, and keep litter boxes away from pupils
- 15.8.4. Supervise pupils when playing with animals
- 15.8.5. Seek veterinary advice on animal welfare and animal health issues, and the suitability of the animal as a pet

15.9. Pupils vulnerable to infection

Some medical conditions make pupils vulnerable to infections that would rarely be serious in most children. The school will normally have been made aware of such vulnerable children. These children are particularly vulnerable to chickenpox, measles or slapped cheek disease (parvovirus B19) and, if exposed to either of these, the parent/carer will be informed promptly and further medical advice sought. We will advise these children to have additional immunisations, for example for pneumococcal and influenza.

15.10. Exclusion periods for infectious diseases

In the event of an epidemic/pandemic, we will follow advice from Public Health England about the appropriate course of action, this will include (but may not be limited to) guidance on social distancing, face coverings, alternative arrangements for entering and exiting the school, travel to school/workplace, and specific groupings for staff/students.

16. New and expectant mothers

- 16.1. Risk assessments will be carried out whenever any employee or pupil notifies the school that they are pregnant.
- 16.2. Appropriate measures will be put in place to control risks identified. Some specific risks are summarised below:
 - 16.2.1. Chickenpox can affect the pregnancy if a woman has not already had the infection. Expectant mothers should report exposure to antenatal carer and GP at any stage of exposure. Shingles is caused by the same virus as chickenpox, so anyone who has not had chickenpox is potentially vulnerable to the infection if they have close contact with a case of shingles
 - 16.2.2. If a pregnant woman comes into contact with measles or German measles (rubella), she should inform her antenatal carer and GP immediately to ensure investigation
 - 16.2.3. Slapped cheek disease (parvovirus B19) can occasionally affect an unborn child. If exposed early in pregnancy (before 20 weeks), the pregnant woman should inform her antenatal care and GP as this must be investigated promptly

17. Occupational stress

- 17.1. We are committed to promoting high levels of health and wellbeing and recognise the importance of identifying and reducing workplace stressors through risk assessment.
- 17.2. Systems are in place within the school for responding to individual concerns and monitoring staff workloads.

18. Accident reporting

18.1. Accident record book

- 18.1.1. An accident form will be completed as soon as possible after the accident/incident occurs by the member of staff or first aider who deals with it. An accident form template can be found in the staff handbook or copies are available from school office.
- 18.1.2. As much detail as possible will be supplied when reporting an accident/incident
- 18.1.3. Information about injuries will also be kept in the pupil's educational record
- 18.1.4. Records held in the accident book will be retained by the school for a minimum of 3 years, in accordance with regulation 25 of the Social Security (Claims and Payments) Regulations 1979, and then securely disposed of.

18.2. Reporting of accidents

- 18.2.1. The Local authority will keep a record of any accident which results in a reportable injury, disease, or dangerous occurrence as defined in the RIDDOR 2013 legislation (regulations 4, 5, 6 and 7).
- 18.2.2. Accidents and incidents that are related to work being carried out in the workplace are reported to the local authority. Playground incidents that are not a result of work or a failure in the workplace (bumping heads for example) are only recorded internally.
- 18.2.3. The local authority will report RIDDOR accidents to the Health and Safety Executive as soon as is reasonably practicable and in any event within 10 days of the incident.
- 18.2.4. Reportable injuries, diseases or dangerous occurrences include:
 - Death
 - Specified injuries. These are:
 - 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)
 - Any scalping requiring hospital treatment
 - Any loss of consciousness caused by head injury or asphyxia
 - Any other injury arising from working in an enclosed space which leads to hypothermia or heat-induced illness, or requires resuscitation or admittance to hospital for more than 24 hours
- 18.2.5. Injuries where an employee is away from work or unable to perform their normal work duties for more than 7 consecutive days
- 18.2.6. Where an accident leads to someone being taken to hospital
- 18.2.7. Where something happens that does not result in an injury, but could have done
- 18.2.8. Near-miss events that do not result in an injury, but could have done. Examples of near-miss events relevant to schools include, but are not limited to:
 - 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

19. Training

- 19.1. Our staff are provided with health and safety training as part of their induction process.
- 19.2. Staff who work in high risk environments, such as in science labs or with woodwork equipment, or work with pupils with special educational needs (SEN), are given additional health and safety training.

20. Monitoring

- 20.1. This policy will be reviewed by the School Business Manager annually.
- 20.2. At every review, the policy will be approved by the Headteacher via the Health and Safety Committee and the Local Governing Body.

21. Links with other policies and/or guidance

This health and safety policy links to the following documents:

- PEEP Procedure
- Risk assessments
- Supporting pupils with medical conditions
- First Aid Policy
- Emergency Evacuation Procedures
- Guidance for obtaining an eye test for DSE users
- Premises management policy
- CCTV policy
- SARS-CoV-2 SUPPLEMENT TO HEALTH & SAFETY POLICY