



# DORMSTON SCHOOL

## Health & Safety Policy

When we go to work we expect to come back in the same condition as we went. We don't expect to have lost a little finger or have been infected with a disease; we also expect reasonable provision for our comfort and well being. Employers have a legal and moral duty to greater or lesser extent to ensure our health, safety and welfare at work.

Several common law duties of care exist to ensure the employer takes reasonable care of their employees, the most important of a number of pieces of legislation is probably the Health and Safety at Work Act. ***It shall be the duty of every employer to ensure, so far as it is reasonable practicable the health, safety and welfare at work of all employees.***

The schools safety policy is a written statement of the employer's intent to ensure the safety of their employees. The Act requires employers to prepare the statement and bring it to the attention of all employees.

### Rationale

Under the requirements of the Health & Safety at work act 1974 the employer must have a Health & Safety Policy and arrangements to implement it, key elements of the policy are as below:

#### 1: The Schools Health & Safety Policy Statement

(This section sets out the health & safety objectives for the school and is adopted by the Head Teacher and the Chair of the governing body)

#### 2: The Schools organisation for health and safety and their responsibilities

(This section details the structure for management of health and safety and outlines the responsibilities delegated to senior managers, teachers and other employees)

3: Standard arrangements/procedures that ensure safe working practices are undertaken within the school.

(This section contains the arrangements in the form of procedural documents for the management of safety issues that impact on the school community)

4: Policies

5: Employers must also assess the risks of all activities, introduce measures to manage those risks, and tell their employees about the measures in place to manage those risks.

6: Accident Reporting

7: DSE Assessment

8: C.O.S.H.H (Control of Substances Hazardous to Health)

## **Section 1**

### **General Statement of Health & Safety Policy**

This policy is subsidiary to the Directorate of Children's Services Health & Safety policy statement and Dudley MBC's Corporate Health & Safety policy statement and is provided in accordance with section 2(3) of the Health & Safety at Work Act 1974.

The Schools governing body along with the schools senior management team recognise and accept their legal responsibilities for Health & Safety within the school. We recognise as responsible employers and/or as persons in control of premises the need to provide a safe working environment for employees, pupils and any others who may be affected by our activities.

To ensure the above is met the Schools governing body and senior management team will so far as is reasonable practicable provide to ensure that:

- Compliance with all relevant H&S legislation applicable to us is managed
- Information, instruction, training and supervision is provided
- The premises and grounds are maintained in a safe condition
- There is safe access and egress to all parts of the school premises
- Plant and equipment is safe to use
- Safe systems of work are defined, implemented and managed
- Off site visits are conducted in a safe manner and risks are identified and controlled
- The handling and use of substances and articles is safe at all times and procedures exist for their safe use
- Adequate welfare facilities exist at all times

- Risk Assessments are undertaken for all tasks, and information is readily available, appertaining to the risk assessment and the controls required to ensure a safe working culture.

To ensure that Health & Safety is given a high profile within the school the governing body will within its allocated resources from the devolved capital set aside adequate finances for this policy to be complied with and any allocated works/safety projects to be completed.

To provide for continued improvement in our health & Safety performance staff are encouraged to support the governing body in their implementation of this policy and other initiatives for the school.

Health & Safety consultation is important to us and will be undertaken as appropriate on matters affecting the health & safety of employees, pupils or visitors to the school.

This policy statement, along with section 2 the organisational structure and section 3 the arrangements and procedures, has been approved by the schools governing body.

## **Section 2**

### **Organisation for Health & Safety**

#### **School Governing Body**

School Governing bodies have responsibilities for protecting the health and safety of Staff, pupils and visitors as follows:

- To take all reasonable measures within their power to ensure the school premises are safe and not hazardous to the health and safety of staff, pupils and visitors. The Council, as the Local Authority (LA), may take action where a governing body does not discharge this duty appropriately under the scheme of delegation.
- To accept their responsibilities and carry out the requirements of the Health and Safety at Work etc. Act 1974 and other relevant legislative requirements introduced through Act's, Regulations or Guidance, so far as is reasonably practicable.
- To assist the Head teacher to produce and implement an effective Health and Safety Policy including Organisational arrangements and Procedural documents for work activities.
- To regularly review the health and safety arrangements within the school to ensure that the organisational structures are effective and meet the needs of the school.
- To agree with the Head teacher a policy for financing health and safety matters which come within the responsibility of the school, and to notify the council of all health and

safety matters which cannot be resolved for financial or other reasons, whether or not it is the responsibility of the school.

- To be aware of and comply with safety legislation, codes of practice and guidance notes and their application to the school.
- To receive through the Head teacher or school staff copies of health and safety reports or fire reports noting the action taken or to be taken to implement the recommendations or requirements.
- To support the management of the school to ensure all school staff carry out their health and safety responsibilities and duties.
- To ensure that the appropriate training is given to inform and educate school management and staff of their health and safety responsibilities and duties.
- To establish as a matter of good practice committee's that deal with health and safety matters e.g. Site and Premises Committee, fire risk committee or similar designated committee.
- To receive minutes of the committee's and to confirm or recommend the appropriate action necessary.
- To encourage and support the work of the trade union appointed safety representatives in carrying out their role within the school.

### **Head Teacher**

The Head teacher has the following responsibilities:

- To establish and implement a suitable Health and Safety Policy within the school, the policy is to include the organisational arrangements necessary to make the policy within the school effective.
- To be responsible to the Governing Body for securing the full implementation of the schools Health and Safety Policy.
- To establish and regularly review risk assessments (Generic, Specific and Fire) as required by the relevant legislation and to incorporate the findings of the assessments into a risk management process within the school.
- To regularly review the schools Health and Safety Policy and the supporting organisational arrangements and practices.

- To ensure that arrangements are made for informing governors and staff about the health and safety policy and that they have access to it.
- To ensure that health and safety responsibilities and duties are properly assigned, accepted and understood by the relevant staff and to review periodically the effectiveness of the health and safety arrangements.
- To ensure all staff comply with the requirements of the health and safety policy and supporting rules/procedures.
- To encourage and support the school staff in carrying out their health and safety responsibilities and duties.
- To ensure there is a designated member of staff (which may be the Head teacher) to undertake specific duties on health and safety and to act as "safety co-ordinator" between the school, the council, the safety officer's, the enforcing authorities and service providers.
- To maintain copies of the relevant health and safety publications, codes of practice, guidance notes and safety booklets and ensure these documents are readily available for use by staff.
- To ensure that the appropriate training is given to inform management and staff of their health and safety responsibilities and duties.
- To encourage and support the health and safety training for school staff and pupils.
- To encourage and support the work of any school health and safety committee and its individual members.
- To receive minutes of the health and safety audits and to confirm, or recommend, the appropriate necessary action to be taken.
- To encourage and support the work of the trade union appointed safety representatives in carrying out their role within the school.
- To prepare health and safety reports of a technical or financial nature as required.
- To receive health and safety reports prepared by school staff and to act upon them as appropriate.
- To receive health and safety and maintenance reports from the authorities safety officers, the Health and Safety Executive (HSE) inspectors, the West Midlands Fire Service, The Environmental Health Officers and service providers, bringing the problems and recommendations to the attention of the school staff and governors.

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- To draw up a schedule of items or activities for which the school is responsible, laying down safe working procedures, where this is required by relevant legislation.
- To draw up a programme of work in conjunction with the school governors to implement health and safety requirements where the responsibility lies with the school in accordance with the scheme of delegation.
- To establish an effective control system for the employment of contractors through which their safety policies are vetted and their work procedures monitored in accordance with the scheme of delegation.
- To consult with the council regarding the implementation of health and safety requirements where the responsibility lies outside the school.
- To consult with the councils Safety Officer or West Midlands Fire Service Officer's prior to making changes to the layout of the school or undertaking activities which could affect general or fire safety.
- To establish and implement an effective accident reporting procedure within the school in accordance with the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 and guidelines supplied by the council and monitor the processing of accident forms in accordance with the accident reporting procedure.
- To establish and implement an effective first aid procedure within the school in accordance with the Health and Safety (First Aid) Regulations 1981 and guidelines supplied by the HSE/DCSF.
- To maintain an effective fire evacuation procedure and conduct regular fire drills to test the effectiveness of the procedures.
- To set up, co-ordinate and monitor the procedure for testing portable electrical appliances and ensuring that a log is kept of all appliances, their periodic inspections (as defined by the Electricity at Work Regulations) and tests by a competent person.
- To agree safety procedures for special events, which involve the use of temporary lighting, displays or plant and equipment etc. being brought onto the premises.
- To STOP IMMEDIATELY any work, process, plant or equipment (including contractors operations) where it is considered there is a serious breach of health and safety legislation, or a hazard has been created that is likely to affect staff, pupils or visitors to the school and to inform the Safety Officer immediately of any actions taken.

**School Management Team (this includes Deputy Heads, School Business Manager, Curriculum Leaders, Heads of House, Heads of Departments, Site Managers, and Clerical Managers/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 day-to-day responsibility for the implementation and operation of the school's health and safety policy within their relevant departments and areas of responsibility.

In particular they will ensure for their areas of responsibility that:

- Safe methods of work exist and they are implemented.
- Staff, pupils and others under their area of responsibility are instructed in safe working practices.
- Health and Safety rules and procedures are applied effectively and complied with.
- Risk assessments are conducted for all leisure, work and experimental activities and information on the risk assessments is disseminated to relevant persons.
- Safety inspections are regularly made and reports are provided to senior managers on the findings so that resources can be allocated to correct deficiencies.
- Guarding fitted to all plant and equipment is adequate for the task and regularly inspected.
- Signs are displayed advising of authorised use only for plant and equipment and that unauthorised use is prevented at all times.
- Appropriate facilities in the form of personal protective equipment and fire/first aid facilities are available at all times.
- Hazardous, flammable and highly flammable substances are stored correctly.
- Any Health and Safety concerns are reported to the Head Teacher or their deputy immediately identified.

**School Health and Safety Co-ordinators (Mr Simon Carroll, Mr Neil Eveson)**

The Head teacher may delegate these responsibilities to the Health and Safety Co-ordinator in part or in full:

- 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 schools 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 practice 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 managers, of premises and other work places, plant, tools, equipment and work activities, reporting to the head teacher and other managers who have responsibilities 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 councils Safety Officers, the Health and Safety Executive Inspectors, West Midlands Fire Service 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 procedure 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 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 Head teachers or heads of departments to STOP IMMEDIATELY any work process, plant or equipment (including contractors operations) where it is considered there is a serious breach of health and safety legislation, or where a hazard has been created likely to affect the safety of staff, pupils or visitors to the school.

### **Class Teachers**

Class teachers are responsible to:

- Exercise effective supervision of their pupils
- Understand the fire evacuation procedures for the school and assembly points to evacuate to.
- Understand the first aid and accident reporting procedures and to comply with them.
- Follow the health and safety measures identified for their area of teaching and any relevant safety procedures e.g. CLEAPS.
- 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.

### **Employees [including temporary and voluntary]**

All employees 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:**

- Co-operate with the Head Teacher and the school management team, so as to enable them to carry out their statutory duties and responsibilities effectively.
- Report to their Heads 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 is sustained or plant or equipment damaged.
- Co-operate in the investigation of accidents or incidents with the object of preventing a recurrence and with any statutory duty placed on the School Management Team.
- Undertake their duties in accordance with their training, instruction and Schools policy.
- Use all machinery, equipment, dangerous substances and safety devices provided in accordance with training and instruction received.
- Attend all training courses and briefing sessions required by their Head of Department and Schools policy.

### **Directorate of Children's Services Health and Safety Officer**

The Health and Safety Officer for the Directorate is responsible for providing advice and support to schools on all aspects relating to Health and Safety.

Their main brief is to:

- Facilitate the implementation of Corporate Policy within their directorate.
- Develop directorate policy where no corporate policy exists due to the nature of their activities
- Implement directorate procedures to comply with corporate policy
- Advise directors/senior managers, line managers and schools on health and safety issues

- Inspect premises/sites
- Develop health and safety training courses and delivery
- Monitor/audit and review health and safety progress across their directorate
- Liaise with enforcement agencies
- Should the need arise due to risks to life in serious injury to stop the activity/close the premise – reporting back to the appropriate director as soon as practicable and the corporate health and safety team
- Investigation of serious accidents/incidents
- Preparing an annual health and safety report and advising their respective DMTs on action plans in consultation with Corporate Health and Safety.
- Liaise on a regular basis with the Corporate Health and Safety Team.
- Contribute to the development of corporate policies and procedures.
- Represent their directorate at working groups on request of the Principle Corporate Health and Safety Officer.

### **School Health and Safety Representatives**

The Governing Body and Head teacher recognise the role of the safety representative and we 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.

### **Functions of safety representatives**

- To represent the employees in consultation with the employer
- To investigate potential hazards and dangerous occurrences at the workplace (whether or not they are drawn to his attention by the employees he represents)
- To examine the causes of accidents at the workplace
- To investigate complaints by any employee he represents relating to that employee's health, safety or welfare at work

- To make representations to the employer on matters relating to health and safety arising from the above points
- To make representations to the employer on general matters affecting the health, safety or welfare at work of the employees at the workplace
- To carry out workplace inspections
- To represent the employees he was appointed to represent in consultations at the workplace with inspectors of the Health and Safety Executive and of any other enforcing authority
- To receive information from HSE inspectors
- To attend meetings of safety committees where he attends in his capacity as a safety representative in connection with any of the above functions;

### **Pupils**

All pupils will be responsible for:

- Complying with school rules and procedures and any instructions given in an emergency situation
- Taking reasonable care of themselves and others
- Co-operating 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
- Not to misuse anything provided for the purpose of safety or fire requirements
- Report to their teacher/Head teacher anything they believe to be harmful or dangerous

### **Section 3**

#### **General Arrangements**

To ensure a continued safety culture and provide control against risks from activities undertaken by the school the following procedures and arrangements have been developed/Undertaken.

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- Accident Reporting and Investigation
- Asbestos Survey
- Consultation with staff
- Buildings work and contractors – Through Dudley MBC, using registered companies for CDM
- Display Screen Equipment Assessments
- Electrical equipment/appliances testing (PAT testing)
- First Aid Provision
- Fire Safety Risk Assessment – EAP
- Glass/Glazing Survey
- HSE Powers
- Legionnaires Disease Survey
- Lone Working Policy
- Manual Handling – Risk Assessment
- Noise Assessment
- New and Expectant Mothers as per Directorate Procedure and Risk Assessment
- Off site educational visits
- Personal protective equipment – PPE requirements
- Play equipment/play areas – Risk Assessments
- Pupils work experience
- Risk Assessments
- Stress at work – as per Directorate
- Substances – as per Directorate
- Vehicle/pedestrian segregation
- Violence at Work – Policy
- Working at height – Risk Assessment
- Work equipment

#### **Section 4**

##### **Policies linked to this document**

- Smoking Policy
- Asbestos
- Child Protection
- Stress Management
- Risk Reduction Strategy
- Risk Assessments
- Fire Risk Assessment
- Evacuation records
- Manual Handling
- C.O.S.H.H
- R.I.D.D.O.R

- Personal Protective Equipment
- Site Waste Management
- Health & Safety Audits
- Security
- Personal Safety, Lone Working

These are linked too:

The Management of Health and Safety at Work Regulations 1999

The Fire Precautions (Workplace) Regulations 1997

The Manual Handling Operations Regulations 1992

The Personal Protective Equipment Regulations 1992 (often called PPE)

The Display Screen Equipment Regulations 1992 (often called DSE)

The Control of Substances Hazardous to Health Regulations 2002 (often called COSHH)

The Noise at Work Regulations 1989

The Control of Lead at Work Regulations 1980

The Control of Asbestos at Work Regulations 2002

The Construction (Design and Management) Regulations 1994 (often called CDM)

## **Section 5**

### **Risk Assessments**

**Risk assessment** is simply a systematic way of thinking about and anticipating what can go wrong, how likely it is happen and what needs to be done to prevent or control; it. The school undertakes risk assessments on activities, areas and manual handling for control.

There are four reasons for carrying out risk assessments:

- **Good practice**- it is a proactive means for identifying and preventing or reducing risks to health and safety arising out of work before an accident happens or ill health is caused.
- **Financial** - it costs a little to train people to become competent assessors and to give them time to carry out their duties but that is trivial compared with the costs of accidents or ill health.

- **Policy** - it is a means of working towards the stated aim of The Dormston School to take all reasonable steps to safeguard the health and safety of employees, pupils and anyone else affected by the work of the school.
- **Legal** - Several pieces of health and safety law require risk assessments to be carried out as a means to ensure that legal obligations are met. (See above).

## **WHO SHOULD CARRY OUT RISK ASSESSMENTS?**

Managers have the responsibility for carrying out risk assessments for their teams on behalf of the Council as the employer but may delegate this work to a competent person (Neil Eveson). This would include all staff at the school.

There is no hard and fast rule about who should carry out assessments but the people doing it need the following qualities:

- Competent - i.e. have sufficient health and safety knowledge, experience and training. The law says that where there is a competent person employed within an organisation that person should be appointed rather than, for example, an outside contractor.
- Methodical.
- Thorough.
- Objective.
- A good communicator - both to discover the information they need and impart the results of the assessments in a comprehensible form.
- Have a good understanding of the tasks they are assessing.
- Part of a team - a team is more effective than an individual, not least because a team can offer support.
- Authority - (or at least access to it) to ensure that the improvements identified by risk assessments are acted on.
- Support from management - to be given time and facilities to carry out assessments.
- Know their limitations - particularly when they will need to get specialist help. To be an assessor to carry out more complex COSHH, Manual Handling, fire, CDM and DSE assessments requires additional training - contact your training adviser for details of additional courses.

In house training is available for any employee who is to carry out risk assessments.

## **WHAT DOES IT INVOLVE?**

First of all identify the tasks, areas or even service users to be examined and decide in what order they are to be tackled. Then:

- Identify the hazards
- Assess the risks
- Decide if additional controls are needed and make an action plan to implement these.

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- Record the assessment
- Inform people who need to know
- Monitor the controls
- Review the assessment

These are looked at in more detail below:

### **Identify the hazards**

A hazard is something that has the **potential** to cause harm. The harm might be physical or mental. All tasks, situations and activities need to be thoroughly examined to identify hazards. Concentrate on significant rather than trivial hazards i.e. more significant in the work situation than in everyday life.

- Start by asking the employees actually doing the work what the hazards are. Back that up by personal knowledge and direct observation.
- Examine the accident or near miss records for that section.
- Other documents may be useful e.g. data sheets for chemicals, operating instructions, case notes for clients, manuals and reference works.

Other sources of information are managers, Trade Union (TU.) safety representatives, portfolio health and safety coordinators or advisers and the Corporate Occupational Health and Safety Team.

### **Assess the risks**

The risk is the likelihood of the harm from the hazard actually happening in the situation as it exists now (with any existing, reliable controls in place).

To assess this likelihood several things need to be considered:

Who might be harmed?

- the employee(s) doing the work?
- other employees?
- a pupil, service user, customer, resident or passerby?
- a contractor?
- Are any of these people particularly vulnerable?- Children, elderly, pregnant, disabled? In the case of employees under 18, pregnant or nursing employees and disabled employees there is a need to consider their personal vulnerability and abilities in the risk assessment.
- How severe is the outcome likely to be - is it likely to be a minor injury or kill someone?
- How likely is it to happen?

Once these factors have been considered apply the risk rating system detailed below to arrive at a category of low, medium or high risk. This gives a framework for applying a value judgment as to the acceptability of the risk and where to prioritize resources to improve matters.

All risks must by law be controlled as far as is reasonably practicable. What is reasonably practicable depends on what is technically feasible and the benefit compared to the cost. Obviously there is more justification to commit more resources to preventing someone being killed than there is to expending the same amount just to prevent a trivial injury.

### Risk rating system

SEVERITY			PROBABILITY	
outcome	example	score	outcome	score
<b>MINOR</b>	Bruising, minor cuts, mild irritation to skin or eyes	<b>1</b>	<b>Unlikely</b> (eg no previous history)	<b>1</b>
<b>SERIOUS</b>	Loss of consciousness , burns, broken bones, injury or condition resulting in 3 or more days absence	<b>2</b>	<b>Possible</b> (eg similar incidents have happened in the past)	<b>2</b>
<b>MAJOR</b>	Permanent disability , major notifiable injury or disease	<b>3</b>	<b>Probable</b> (eg same situations have happened in the past)	<b>3</b>
<b>FATAL</b>	DEATH	<b>5</b>	<b>Highly probable</b> (eg has occurred recently here or in another organisation)	<b>5</b>

**Probability score x Severity score = Risk Rating total**

Risk rating total

1-4            low risk

5-15          medium risk

15-25        high risk

In a few cases the results of an assessment may come out as high risk and yet still be regarded as acceptable. It will depend on the wider benefits to be gained from allowing that risk to continue. An example would be some of the work carried out by employees in emergency situations where the benefits to public protection outweigh the risk to the individual. That is not to say that measures can't be taken by means of training, work procedures, equipment and support to control the risk to a certain extent.

**Decide whether additional controls are needed and get these implemented.**

It may well be that existing measures already sufficiently control risks but sometimes additional controls are needed. Where these can't be implemented immediately an action plan should be drawn up and recorded, clearly indicating the timescales that are being worked to.

The law says that the following preventative measures must be considered:

- a) avoid risks
- b) evaluate risks that can't be avoided
- c) combat risks at source
- d) adapt the work to the individual (consider design of workplace, choice of equipment and work methods)
- e) adapt to technical progress
- f) replace the dangerous by the non –dangerous or less dangerous
- g) Develop an overall policy taking into account technology, work organisation and conditions, social relationships and the environment.
- h) give greater priority to measures that will protect more than one person
- i) give appropriate instruction to employees

If at all possible risks should be combated at source and eliminated wherever practicable. Substituting something safer or bringing in a safer system of work should be the next control to be considered. Measures that will protect as many people as possible - not just the employee doing the work are preferred.

Some risks can be reduced by enclosing the hazard or removing people from the vicinity or reducing their chance of contact with it.

Employees can be encouraged to work more safely if they are trained. Health and safety training is a legal requirement and must be given:

- on induction
- when the work changes significantly
- when the employee changes jobs
- and periodic refresher training

Employees and others affected by the Schools work will require information and instruction; this could be in the form of written procedures, permit to work systems, signs, notices or labels.

Some employees will need supervision to ensure that they can work safely, especially if they are young, have learning difficulties or are inexperienced.

Personal protective equipment - gloves, masks, helmets, boots, ear defenders etc. should only be considered as a last resort.

Choosing the *idea*/means of control may be relatively easy - but remember that what is recommended must be reasonably practicable (i.e. cost effective and workable) otherwise the risk assessment process loses credibility and getting controls implemented may become harder!

### **Record the assessment**

This format is tried and tested and in use in many parts of the Council but other forms of recording risk assessments can be used.

All that needs to be recorded is:

- The significant risks
- The controls
- Who is affected
- The name of the person who carried out the assessment and when - so that if anyone needs further information they know who to contact and so they can make sure they've got an up-to-date version.

The controls recorded should be specific and if other documents are referred to eg policies or procedures then their titles should be given and where they can be found.

### **Inform people who need to know**

The main people who need to know about risk assessments are the employees carrying out the work. Their co-operation is needed to ensure that the controls identified actually work in

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practice. The best way of letting these employees have this information must be considered. It must be straightforward, clear, concise and comprehensible. Options that are in use in the school include:

- Making risk assessments available on the shared drive.
- Keeping a copy in a readily accessible file or folder.

Managers and supervisors need to be well informed about risk assessments too - it is their job to ensure new starters are given the necessary information.

Other people may need access to risk assessments from time to time so they must be readily retrievable. The Health and Safety Executive (HSE) inspectors have a right to examine them as do Trade Union Health and Safety representatives.

If you are a designer for construction purposes you must always assess the risks of any proposed design and communicate any unusual or significant risks to the contractor and planning supervisor involved in the project. Highlighting the risks on plans and drawings is recommended.

### **Review the Risk Assessments**

Work changes frequently and for risk assessments to remain a useful tool in improving health and safety they must be reviewed regularly at least once a year to check that:

- they are still relevant
- something hasn't been overlooked
- that the controls for one risk haven't created another

As well as the annual review, risk assessments should also be reviewed after an accident, near miss or complaint and when there are significant changes. These changes might be in:

- equipment
- personnel
- the law or guidance
- the system of work
- technology
- information from a supplier

Sometimes risks change or develop during the course of an activity or task which requires the person carrying out the work to respond immediately and take action to control these new or worsened risks. There is usually no opportunity to record this as a formal risk assessment at the time and nor is this expected. The experience however should be used to inform a review of the recorded assessment and see whether changes are needed in the way the task is tackled in future.

## **WHERE TO GET HELP AND ADVICE**

Help is available from various sources:

- School Health & Safety Advisors – Simon Carroll, Neil Eveson.
- Portfolio Health and Safety Co-ordinators
- The Corporate Occupational Health and Safety team
- The health and safety pages on the intranet.
- The HSE produce a wide range of guidance too, much of it free if you only need a single copy. Useful website [www.hse.gov.uk](http://www.hse.gov.uk)
- TU. Health and Safety representatives.

## **Section 6**

### **Accident Reporting**

The definition of an accident is an unexpected, undesirable event which causes damage or harm, therefore it is thought of as something which happens without planning or intention; chance

Accidents do not just happen there is always a cause behind the event and this can be down to a management failure or a human trait.

### **Dudley Corporate accident procedure**

The corporate Health and Safety department for Dudley MBC have developed an accident reporting procedure and within this procedure there are corporate reporting forms that must be used for the reporting of all accidents, this procedure can be found by following the link: [http://insidedudley/corporate/info&res/healthsafety\\_/scheduleb11/default.htm](http://insidedudley/corporate/info&res/healthsafety_/scheduleb11/default.htm)

The procedure makes reference to procedure 1 requiring following for employees and this is the A3 accident book that should be completed.

If the accident relates to a school pupil the form found at appendix 3 of the procedure must be used.

These forms are to be used for the reporting of all accidents no matter how small or trivial they may seem.

### **1. Where to report accidents/incidents**

All completed accident forms are to be forwarded to Westox House FOA Anne Poole or Jan Chambers.

### **2. Time Scale for Reporting**

All accidents should be reported as soon as you are aware of them.

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The HSE require accidents that result in a loss of three days or more from work to be reported to the HSE within 10 days, the process for reporting this is to complete a form known as F2508 which can be done via the internet ([www.hse.gov.uk/riddor](http://www.hse.gov.uk/riddor)) this form will be generally completed by the staff at Westox House, however if one is completed by the school then a copy must be immediately forwarded to Westox House staff to prevent duplication.

The expression 'three days or more' means, in practice at least four days. "For example, if a person who normally works Monday to Friday is injured on Friday and returns to work the following Wednesday, the Saturday and Sunday would have to be included when counting the days of incapacity. The total period of incapacity would be four days and the injury must be reported".

If the accident involves a major injury or death then it must be reported immediately, a major injury is defined below:

- Any fracture (break, crack or chip) other than to the fingers, thumbs or toes.
- Any amputation.
- Dislocation of the shoulder, hip, knee or spine.
- Loss of sight (whether temporary or permanent).
- A chemical or hot burn to the eye or any penetrating injury to the eye.
- Any injury resulting from an electric shock or electrical burn (including any electrical burn caused by arcing or arcing products) leading to unconsciousness or requiring resuscitation or admittance to hospital for more than 24 hours.
- Any other injury:
  - leading to hypothermia, heat-induced illness or to unconsciousness,
  - requiring resuscitation or
  - requiring admittance to hospital for more than 24 hours.
- Loss of consciousness caused by asphyxia or by exposure to a harmful substance or biological agent.
- Either of the following conditions which result from the absorption of any substance by inhalation, ingestion or through the skin -
  - acute illness requiring medical treatment; or
  - loss of consciousness.
- Acute illness which require medical treatment where there is reason to believe that this resulted from exposure to a biological agent or its toxins or infected material.

### **3. Investigation of accidents**

The school will investigate accidents, incidents and near misses to provide a report and record of the events that lead up to the occurrence, the occurrence and the immediate action taken after the occurrence.

The report will be kept on file up to a period of time relevant to three years after the young person has reached the age of eighteen.

For employees the documents should be kept for a period of three years after the harm has become apparent. In general terms this could be for the life of the employee.

It is important that accidents are investigated as quickly as possible after the occurrence, providing that it is safe to enter the accident zone. Any delays could mean that it is less likely that the true facts may be ascertained.

Where there are witnesses it is advisable to obtain statements as soon as possible, ensuring that witnesses are not allowed to gather to discuss their version of the events as this could paint a completely different picture by confusing their version with some other persons. Witness statements are required for HSE reporting and where a civil claim may result. Photographs are also very useful in an investigation and should be taken as soon as possible after the incident has occurred.

A thorough investigation should answer the following questions:

- What caused the accident?
- Who & what was involved?
- When did it occur?
- Where did it occur?
- Why did it occur?
- How could it have been prevented?
- How can a recurrence be prevented?

It may well be useful in remembering the start of Rudyard Kipling's poem; I keep six honest serving-men, when undertaking an accident investigation

I keep six honest serving-men

(They taught me all I knew);

Their names are what and why and when and how and where and who.

The cause of an accident should never be classified as "carelessness" as the only remedy to a careless act is to be more careful in the future, a thorough investigation should look into whether the cause was e.g. due to not following instructions or written procedures.

#### **4. Accident Investigation Report (Appendix 2)**

This record enables all details relating to the circumstances surrounding an accident/incident to be recorded, and is designed to facilitate an effective investigation process. Part 1 of the record simply involves recording the personal information relevant to the accident/incident.

In part 2, under 'working conditions', where there are no deviations from the normal working conditions at the time of the accident/incident, 'normal' should be entered in the box. Where there was some deviation, such as poor weather, these details should be entered. At this relatively early stage, the investigator should enter the possible cause of the

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accident/incident when describing how it occurred. It does not matter if further investigation reveals that these are not the main causes.

Part 3 should summarise the potential risk of the accident/incident by entering high (H), medium (M) or low (L) into the appropriate box.

Part 4 is the most important part of the investigation process. After reviewing the information that has been obtained. The investigator must list all direct and indirect (contributory) causes of the accident/incident along with details of any corrective action required. To achieve this, it may be beneficial to obtain the views of employees or managers.

Part 5 Guidance on Direct and indirect causes

To consider a simple illustration, suppose someone trips over an unsecured section of carpet flooring and is injured. The direct cause(s) will often be identified quickly – and might include the loose carpet, someone rushing about, perhaps not concentrating or looking where they were going, or carrying something so they could not see where they stepped. The loose carpet will hopefully be secured in place without delay, and in many cases, that is the only outcome.

Suppose, however, that the carpet had been loose for some time, which several other people had previously tripped over, but not sustained injury, that damage to carpets was being reported on a regular basis but nothing was ever done – until someone was actually injured. This could be related to procedural compliances or management failures, which are Indirect causes

The law requires employers to take control measures and manage the risks before an accident occurs. Accident investigations should be looking further than the immediate causes and outcomes.

## **Section 7**

### **DSE Assessment**

GUIDANCE FOR EMPLOYEES ON SAFE WORKING WITH VDUs

**What's a VDU?** The initials stand for visual display unit and includes computers including portable hand held types.

**Is my health at risk?** Only a very small proportion of VDU users suffer ill health as a result of their work and when they do it is usually caused by the way the equipment is used rather than the equipment itself.

**Aches and Pains:** Some users get aches and pains in their hands, wrists, arms, neck, shoulders or back especially after long periods of VDU work, particularly when using the

keyboard or mouse for long spells. Usually these disorders do not last but in a few cases they may become persistent or even disabling.

They can be avoided by good workstation design, adjusting your workstation correctly, learning keyboard shortcuts to minimise mouse usage and taking frequent short breaks from VDU work before you start to notice symptoms.

**Eye problems:** Long spells of VDU work can lead to tired and uncomfortable eyes although there is no evidence of VDUs causing permanent damage to eyes. Again workstation design and adjustment and frequent short breaks from VDU work will prevent problems. You are entitled to an eye test at the Council's expense at the Council's nominated opticians if you are a VDU user. Your Personnel Officer has details of how to arrange for one of these tests.

If you are a contact lens wearer and experience discomfort this could be due to the heat from the VDU and other electrical equipment making the air drier. Talk to your manager about this, as it may be possible to increase the humidity.

Bifocals are often less than ideal for VDU work, as you need to constantly raise and lower your head. The Council's optician will be able to advise you.

**Headaches:** Headaches can be caused by various things connected with VDU work e.g. screen glare, poor image quality, eye problems, stress from the pace of work, anxiety, prolonged screen reading without a break, poor posture or a combination of these.

**Radiation:** VDUs emit visible light and electromagnetic radiation but at levels which fall within internationally agreed safe limits, so there is no need to monitor these or provide shields, screens etc.

**Pregnancy:** Pregnancy has not been shown to be affected by VDU work.

**Skin:** In rare cases skin irritation has been connected with VDU work, the exact cause is not known and improvements to general ventilation and humidity may help.

**Epilepsy:** Photosensitive epilepsy may be provoked by VDU work in some cases.

**Stress:** Stress may be caused by VDU work especially when the technology or system is new, the system is poorly designed or there is excessive work pressure. Talk to your manager or supervisor if you feel this is the case.

**Portable computers:** Portable computers because of their reduced size should not be used in place of full sized equipment for long periods. Wherever possible the portable computer should be set up on a firm surface at a comfortable height with the screen angled so it can be seen clearly with minimal reflections. It is important to take frequent breaks if the work is prolonged.

**Assessments:** Display Screen assessments must be carried out by law for every VDU user - a user is defined as someone who habitually uses a VDU as a significant part of their normal work, usually taken as an hour or more of continuous use per day. The council have trained assessors whose job it is to carry these out. Part of the assessment is a short questionnaire for the user to complete and you are asked to co-operate with this. The assessment of your workstation is a good opportunity to raise with the assessor any concerns you have about your VDU work.

### **How can I help myself?**

Make full use of the equipment provided and adjust it to get the best from it and avoid potential health problems.

### **In practice this means:-**

Adjust your chair and VDU to find the most comfortable position for you. The chair should be adjusted to support the small of your back so that you can sit in a relaxed, upright position with your face about 45-60 cm (18-24 inches) from the screen. Your forearms should be roughly horizontal avoiding angling your wrists either up or down when using the keyboard. The top of the VDU screen should be at eye level.

You should arrange things so that you have sufficient workspace to take whatever documents or other equipment you need. Keep food and drink out of the way, coffee and electricity are a dangerous combination!

Try different arrangements of keyboard, screen, mouse and documents to find what suits you best. A document holder may help you avoid awkward head or neck movements, this should be positioned close to the screen and at the same height as it.

Where possible try to arrange your workstation to avoid glare or bright reflections on the screen. This is easier to do if neither you nor the screen is directly facing windows or bright lights. Curtains or blinds should be used to control unwanted light.

Make sure there is sufficient space under your desk to allow you to move your legs freely, don't store boxes or equipment under your desk. Check that the cables aren't in your way nor creating a tripping hazard for anyone walking near your workstation.

Avoid excess pressure from the edge of your seat on to the backs of your legs and knees. If your feet dangle or only just touch the floor you may be more comfortable with a footrest.

Adjust the position of your keyboard so it is comfortable with a space in front of it for resting the hands and wrists when not keying, a wrist rest may make this more comfortable. Try to

keep your wrists straight when keying, keep a soft touch on the keys and don't over stretch your fingers.

Position the mouse within easy reach so that it can be used without stretching and with the wrist straight. Move the keyboard out of the way if it is not being used. Support your forearm on the desk, don't grip the mouse tightly and only press the buttons lightly.

Adjust the brightness and contrast controls of the screen to suit yourself and the lighting conditions of the room. Keep the screen surface clean.

Many jobs provide natural opportunities to have a break from VDU work e.g. to do photocopying, phone answering, etc. Make full use of these breaks to move around, stretch, blink and allow your eyes to focus at different distances. Frequent short breaks (before you get tired) are better than fewer long ones (to recover). Ideally you should be allowed to decide for yourself when to have a change of activity but where this is not possible then 5-10 minute breaks after 50-60 minutes continuous VDU work should be arranged.

You may sometimes feel under pressure to continue with VDU work for long periods without a break but this runs a very real risk of symptoms developing which will then take time to heal. If you feel under this type of pressure talk to your manager or supervisor.

When setting up software choose a text size that is easy to read and colours that are easy on the eye. If you find that the characters on the screen flicker or move report this to the IT help desk.

Don't sit in the same position for long periods, change your posture as often as practicable but avoid repeated stretching to reach things, put them within easy reach. Exercises at your desk may help, try shrugging your shoulders slowly, stretching your neck from side to side or reaching your arms over your head to reduce tension and loosen muscles.

**Further help and advice can be obtained from The DSE booklets and any DSE Assessor.**

## **Section 8**

### **COSHH**

#### **CONTROL OF SUBSTANCES HAZARDOUS TO HEALTH**

##### **(COSHH) POLICY**

The Coshh Policy is produced for all employees.

***What's it all about ? - The Control of Substances Hazardous to Health - Coshh.***

The Coshh regulations began life in 1988 and like all regulations are continually being reviewed. It was the first attempt at putting into operation a set of **general rules covering the protection of the health of employees** .

The purpose is to talk about **controlling the risks** from substances that are hazardous to health. Many substances are **hazardous** which means that they have the potential to cause harm but the **risk** of anyone actually being harmed depends very much on how the substance is used. For example a bottle of bleach is a hazard but while it sits on the shelf with its lid on the risk of anyone being harmed is low; the risk increases dramatically once the bleach is poured out, spilt or transferred to an unlabelled container.

### **The Policy Explains:-**

How the state of a substance is important, e.g. a solid block may be harmless but dust breaking off it can be deadly.

We know that reading about things like this are not anyone's favourite pastime but please give it a go, you'll find it easy reading and informative, and we hope interesting. More importantly if, having read it, you have any questions you would like to ask please see your H&S representative, if he / she doesn't know he / she can get the answer for you.

### **1. A Substance hazardous to health.**

A substance is said to be hazardous to health if it is Very Toxic, Toxic, Harmful, Irritant, Corrosive, a Biological agent ( e.g. a germ ) a dust or anything else which creates a comparable hazard.

#### ***So who decides if something is Toxic or Very Toxic etc.?***

This is done by a variety of organisations, including manufacturers, following very strict testing procedures and what are known as the CHIP Regulations - Chemicals (Hazard Information and Packaging for Supply Regulations). It is these Regulations which make a manufacturer put a hazard symbol (a black sign on an orange back ground) on the product pack and to supply technical information, **called a data sheet**, about the product to users like ourselves.

### **2. The State of the Substance.**

This means the form that it's in. If we put a block of hard wood on a table and it just sits there being left well alone it's harmless. But if someone comes along and starts sanding it down with an electric sander creating clouds of dust (some of which may be too fine to see), it is potentially deadly. In this case the form or state is critical. The state of a substance clearly has a very significant effect on the way the substance can enter the body.

Let's look briefly at some of the forms a substance can take. (Sorry but a little bit of jargon is unavoidable here):-

**A Gas** is a material that is in a gaseous state at normal temperature and pressure; to us it's simply a gas, e.g. the air we breathe.

**A Vapour** is the gaseous state of something that is liquid or solid at normal temperature and pressure, e.g. petrol vapour

**An Aerosol:** - is the term commonly used to describe pressurized cans e.g. hairspray, technically it means the dispersion of solid or liquid particles in a gas (which could be air). The following are all **Aerosols: - fumes, smoke, mists, fogs and dusts**

### **3. Routes of entry.**

**There are three principal routes of entry:- through the lungs , the skin and the mouth.**

#### ***Inhalation - i.e. breathed in***

The airway is the most sinister way in because we may not know what's happening until it's too late, e.g. breathing in an odourless colourless gas like carbon monoxide. Inhalation is the commonest route of exposure. Remember that it's not just gases we can inhale but vapours and aerosols too.

#### ***Absorption - through the skin***

Via the skin through **contact**:- Carelessness and complacency are often the cause here, how many of us have washed our hands in White Spirit to clean off paint, or not worn the gloves which lay on the kitchen table when using bleach?. The other route of access via the skin is by **penetration** through a cut or by a sharp object e.g. an hypodermic needle. It should be remembered at all times that it may not be just the skin that is damaged through contact or penetration, once in the body the substance can travel around causing damage elsewhere inside you (known as systemic effects).

#### ***Ingestion - swallowed***

Via the mouth :- usually occurs either through splashes or failure to wash hands properly before eating or drinking .

### **4. The effects.**

**There are four main points to consider here:- What the substance does, where it does it, how quickly does it happen and how long do the effects last.**

#### ***What does a harmful substance do ?***

**Quite simply the answer is damage!** Either directly, e.g. A skin rash, or indirectly through migrating to an organ e.g. the liver, remote from the site of contact. (Liver damage is one of the effects of being exposed to solvents for long periods).

Some of the types of damage are categorised as, *(sorry for the technical stuff but there's no way round it):-*

***Carcinogenic*** - can cause cancer,

***Toxic for reproduction*** - can damage the male and female reproductive system,

***Corrosive*** - may on contact cause destruction of living tissue or burns,

***Irritant*** - may cause inflammation and irritation on immediate or repeated or prolonged contact with the skin or if inhaled,

***Harmful*** - may cause limited health risk if inhaled or ingested or if it penetrates the skin,

***Toxic and very toxic*** - may cause serious health risks or even death if inhaled, ingested or if it penetrates the skin,

***Mutagenic*** - may cause in-hereditary genetic effects,

***Dangerous for the environment***, e.g. a pollutant which may kill everything in a stream

***Sensitising*** - may cause an allergic reaction,

***Synergistic*** - where simultaneous or rapid exposure to a number of chemicals causes more damage than being exposed to all of them separately, (they combine to make a mixture worse than the sum of the parts),

***Systemic*** - effects move through the system to other parts of the body.

***How quickly can damage occur?***

This can range from immediate -e.g. a severe acid burn - to mesothelioma which can arise 40 years after exposure to blue asbestos.

***How long can the damage last?***

Recovery may be quick e.g. after a few minutes in the fresh air or the damage may last a lifetime.

## **5. What an employer must do.**

The regulations place a number of quite clear responsibilities on employers:-

To protect employees and anyone else who may be affected by their work,

- Not to permit the use of prohibited substances.
- Not to allow employees to carry out any work where there is a risk to their health unless a risk assessment has been carried out and steps needed to control those risks have been worked out, put into operation, everyone who needs to know told about them, and that the system is regularly maintained,
- To give employees adequate information and training, and to provide medical advice when appropriate.

The key part to all this it is the risk assessment, this is where the employer and the user (which may be you) have a systematic look at the work being done and what substances are involved.

## **6. Coshh Assessments.**

As with all risk assessments the first step is to identify the hazards (in this the case the substances in use or encountered in the course of work), then assess the risks i.e. who is at risk? For how long? How badly are they likely to be damaged? When all this information has been collected then a decision has to be made on how to control the risks.

The first objective is to **prevent** exposure to hazardous substances but where this is not reasonably practicable exposure must be controlled.

The best method of preventing exposure is **not to use the substance at all**, e.g. does the job really need to be done, could altering some earlier process make it unnecessary, if not could we use a non hazardous substance?

The next stage is to think about control measures, e.g. could the process be enclosed, could ventilation systems be introduced etc? These control measures need specified maintenance procedures to make sure that they work properly all the time, they can range from regular cleaning of the workplace to air monitoring checks.

Regular medical examinations or less detailed health surveillance are the next consideration followed by the need to inform, instruct and train users.

The last resort should be the use of **personal protective equipment** (PPE) which should only be used as a means of control if it is still needed once all the other steps have been considered and put into practice as far as possible

**Remember that not all substances are hazardous and therefore do not come under the scope of Coshh e.g. domestic soap**

## 7. Information

### ***So how do we know if a substance is hazardous?***

The answer is - from the information and symbol on the packaging (if there is any) with further information on the data sheet which the manufacturer of the substance must supply. Data sheets are a great help when doing an assessment. Some are still a mass of technical jargon but the majority are now very user friendly.

The data sheet is priceless to the assessor. **What is most important to you as a user is the assessment summary sheet and the material hazard data sheet which are produced during the course of an assessment.** These tell you what you need to know e.g. immediate first aid, spillage procedures, protective clothing and PPE (remember? Personal Protective Equipment).

As a user you need to have read these, discussed them with your supervisor and have your own copies or know where they are kept.

### ***Beware !***

**Not all hazardous substances are conveniently labelled** e.g. dust can be produced by all sorts of jobs, sometimes if two or more substances are being used they can react to give off a hazardous gas or vapour and germs don't come pre -packed either ! These hazardous substances still need to be assessed although sometimes a data sheet may not be available. Talk to your supervisor about these.

## 8. Your responsibilities.

### ***There is one golden rule:-***

Treat each and every substance with respect, take no chances.

### ***As a user:-***

You must always follow the instructions supplied by the manufacturer and those on the assessment summary and material hazard sheets. As a user you need to have read these, discussed them with you supervisor and have your own copies or know where they are kept.

*Yes! You did read this in section 7 and it is worth repeating.* When asked to participate in an assessment please do so, your job knowledge is vital. You also need to remember your training at all times and put it into practice.

### ***As a supervisor:-***

You need to know if any task exposes anyone to hazardous substances that haven't come out of a package and ensure that these have been assessed and that the controls are in place and working.

You need to have the manufacturer's data sheets for all the hazardous substances in use on your patch. You need to have the detailed assessments, the summaries and hazard sheets and to have distributed the latter to your team. It's essential that you meet members of your team to go over these before you issue them, then you need to meet them periodically to discuss any issues arising. All this needs to be done **before** any new substance is used. **Listen to your teams opinions, as users they may have more knowledge than you.** You also need to keep an eye on your team to make sure that standards don't slip through complacency and that their training is up to date.

### ***As a manager:-***

Your role is primarily to carry out periodic audits on what your subordinates and supervisors are doing by **meeting them periodically and discussing Coshh issues.** You need to know that new starters have been given proper information and training, the latter is particularly important, it is your responsibility to get their training done, record that it has been done and make sure that refresher courses are regularly held. You need to be confident that no new substances have crept into use without being properly assessed. Keep records, they may be useful in explaining yourself to the Health and Safety Executive one day.

## **9. Conclusions.**

So you've stayed to the end, and that's encouraging, we hope you have found this information informative but if you have any suggestions as to how it could be improved let us have them.

This policy and all Health and Safety issues are discussed each term at governor level and weekly at leadership team meetings. The student council has an input into any areas the pupils feel there is an issue and these are added to the risk register. This policy and issues are presented to the Finance Committee.

Appendix 1 – Risk Assessment

Appendix 2 - Accident Investigation Report