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INTRODUCTION

Every child has the right to be taught in a safe and healthy environment. It is tempting to see this only in terms of the requirements of the Health and Safety at Work etc Act 1974 or the regulations based on EC directives. Managing health and safety effectively demands more than observing the letter of the law. It requires the committed and informed co-operation of everyone involved in order to create a safe and healthy school. When health and safety management is integrated with the general management of the school, it helps to provide a good working and learning environment.

Health and safety often involves resolving contradictions. It is part and parcel of every activity but it is not the outcome of the activity. At times it may appear to be working directly against the purpose of that activity. Yet, without an effective health and safety strategy, the result can be far from what was intended.

The management of health and safety is both idealistic and pragmatic. It sets the highest standards and, when these are achieved, raises them in pursuit of perfection. It demands a strategy of continuous improvement. Yet at any time its objectives are realistic. Its standards are always attainable and the existence of failure is acknowledged.

However, the acceptance of the aim of the Management of Health and Safety at Work Regulations 1999 to eliminate risks entirely does not sit well with the education of pupils. The officers of the Health and Safety Executive accept that training situations carry risks. For example, it is impossible to train fire fighters without risk. While no one would think of exposing pupils to the sort of risks which face fire-fighters, it is essential, for the purposes of education, that pupils learn to deal with risks in a mature manner. Therefore, codes of practice assume a vital role in education, along with the use of personal protective equipment, in order to keep those risks within controlled boundaries. Equally, this education forms part of the cross-curricular themes of citizenship and economic and industrial awareness. It is not the intention of the Health and Safety Executive that health and safety legislation should be used to prevent proper educational experiences for children.

In order to be effective, a health and safety policy requires everyone to use their imagination, to think for themselves and, when necessary, to take action without waiting to be told. Yet, at a time of crisis, safety is often best served by well-practised drills. The likelihood of such a crisis occurring may also be reduced by a regime of inspections and checks.

Health and safety insists on personal commitment and demands strong, positive leadership. Everyone's views should be heard and respected, but the decision-making process is not always democratic.

When health and safety is successful it is, at best, taken for granted and, at worst, ignored. Its failures are always obvious and are usually broadcast loudly and widely, thus creating the impression that safety only justifies time, effort and resources when it does not work.

However, preventing yesterday's accident is not enough. Once it has been achieved success must be sustained. The production of a successful health and safety strategy is not a one-off event but an ongoing process. Where the balance is struck depends on the individual school. Each school is different. A system, which is successful in a large, urban, secondary school, could fail in a small, rural nursery.

The purpose of this section is to outline management structures, systems and procedures which can be used in schools to identify, assess and control risks to health and safety. The adoption of such structures, systems and procedures can save both money and time.

Under the provisions of the Health and Safety at Work, etc Act 1974 employers have a duty to issue statements of policy to staff. As such the management of LEA-maintained schools should produce a policy which should be vetted by the LEA. The governing bodies of independent, grant-maintained and voluntary-aided schools have the same duty to ensure that they have a policy in place.

This loose-leaf is not intended to be revolutionary and to sweep away existing arrangements. It is meant to be evolutionary and to indicate ways in which Heads and governing bodies can develop and improve their present health and safety provision.

The Management of Health and Safety at Work Regulations 1999 identifies the key components of effective health and safety management.

AIM OF HEALTH AND SAFETY MANAGEMENT

Governing bodies should decide on what they aim to achieve in relation to health and safety within their schools. The aim should be stated in writing. In this way it forms a target on which everyone within the school can focus their efforts. Governing bodies should specify an aim rather than aims, as multiple aims are confusing and compete for attention and resources.

Definition of Aim

An aim should be:

- a simple statement which is easily understood by everyone;
- short, so that everyone can learn it by heart;
- quantifiable;
- attainable - an idealistic aim, which is out of mortal reach, may read well but it will not command respect.

For example, a suitable aim for a school might be to provide a safe and healthy working and learning environment for staff, pupils and visitors. However, terms like "safe" and "healthy" should be defined. If they are not; it is not possible to decide whether the aim has been achieved.

"Safe" and "healthy" are value judgements. For example, "safe" might mean that there are:

- no incidents at all - whether this should include those "near miss" incidents where luck played a larger than expected role should also be stated;
- no accidents;
- no injuries;
- no serious injuries - "serious injury" should also be defined;
- no more than an agreed number of accidents (or injuries) in a given time.

"Healthy" might mean that there are:

- no work or school-related illnesses;
- no serious work or school-related illnesses - "serious" should be defined;
- no work or school-related illnesses which result in more than three days' absence.

Limitations of an Aim

An aim is likely to represent an ideal and, therefore, in practice it has limitations and conditions. The first and foremost aim of the staff of a school is to teach children. It is not to provide a safe and healthy environment. However, an effective health and safety policy leads to a healthy environment, which makes the school a pleasant place to work and study. Teachers and pupils perform better when they feel that their health and safety is looked after as part of the day-to-day management of the school. A safe school is more likely to be a successful school and an effective health and safety strategy is essential to enable the aim of the school, ie: to teach children, to be achieved.

In practice, most limitations have little to do with the relative importance of health and safety and more to do with the allocation of resources. Time, manpower and money are limited. Health and safety planning should ensure that the available resources are used as efficiently as possible. Resource levels should be critically assessed. Time constraints, such as to be complete by dates, should be identified. It is foolhardy to plan assuming that resources are unlimited or that everything can be done at once.

OBJECTIVES OF HEALTH AND SAFETY MANAGEMENT

If an aim is a statement of the outcome of efforts, then objectives are the steps on the pathway, which leads to that aim. Some objectives follow one after another while others are concurrent, but all contribute to achieving the aim. For example, one objective may be to make risk assessment part of the normal workload of all members of staff. However, in order to do these it may be necessary for staff to receive appropriate training before this objective can be tackled. If the regulations relating to risk assessments were to change, then further training might be required.

This highlights one difference between an aim and its objectives. Even though the criteria, which define the aim, may change, the aim remains constant. Objectives change with circumstances or disappear as they are achieved or when they are no longer applicable. Objectives are a management tool and not an end in them. Like the aim, objectives should be stated in terms, which are quantifiable or assessable against a realistic yardstick.

Risk Assessment

Most objectives are related to the actions taken to control risks. Identifying risks is accomplished by carrying out a risk assessment. Where an employer has more than five employees, the Management of Health and Safety at Work Regulations 1999 require the significant findings of the assessment to be written down (see section 1). This includes the estimated scale of each risk and the measures adopted to control it. All LEAs and most governing bodies are likely to have more than five employees.

Some assessments are statutory requirements, or are covered by approved codes of practice. These assessments include those under the Electricity at Work Regulations 1989 and the Control of Substances Hazardous to Health Regulations 1999. Assessments are also needed as part of the Manual Handling Operations Regulations 1992, the Personal Protective Equipment at Work Regulations 1992 and the Health and Safety (Display Screen Equipment) Regulations 1992. Further details on all these regulations can be found in section 1 and also in the Councils Health, Safety and Welfare manual of Guidance.

There are no fixed rules about how a risk assessment should be carried out. The nature of the risk assessment depends on the nature of the workplace and what is being done there. The Approved Code of Practice relating to the Management of Health and Safety at Work Regulations 1999 provides some practical guidance about risk assessment to ensure that all the relevant risks or hazards are addressed (see Section 3.12 (Risk Management and Auditing) of this Manual).

Total Risk Control

There is likely to be more than one way of controlling each risk. Most risk control systems employ a combination of risk control measures. Each individual measure demands resources, both in terms of manpower and finance, before it can be introduced. Some risks, particularly those which involve equipment, require regular attention (eg: the regular servicing of machinery) to ensure that the risks are controlled. Some risk control measures might mean changes to the way activities are carried out and so will have an effect upon the organisation of the school. Some may require a high degree of supervision.

Each measure must be carefully assessed and its advantages and disadvantages should be weighed up against the risk it is intended to control. If the risk is great and the need for action urgent, it may be necessary to introduce less suitable risk control measures immediately as a short-term option while the optimum long-term solution is found.

It can be difficult to decide when a control measure is in keeping with the scale of the risk it is meant to control. The thought of a child being hurt can encourage a "protect at all costs" attitude. However, this is neither possible nor good for the pupils. Instead, teachers must establish and maintain safe practices and procedures, which prevent any foreseeable risk of injury or harm. This does not mean that all risk must or can be eliminated. To eliminate all risk is neither a legal requirement nor a practicable possibility. However, unnecessary danger should be eliminated. In other words, education requires controlled risk.

The terms "so far as reasonably practicable", "so far as practicable" and "best practicable means" are not defined in the Health and Safety at Work etc Act 1974 but case law has given them meanings. They might help in the decision-making process, although their exact application depends on the circumstances surrounding each individual case and, ultimately, may be decided in court.

So far as reasonably practicable

With reference to the Management of Health and Safety at Work Regulations, the employer or a competent person appointed by the employer must establish the limits of reasonable practicability. He decides the most effective control measures possible having balanced the degree of risk to staff, pupils, pupils, visitors or others against the cost (in terms of money, time and trouble) of eliminating or minimising that risk. Therefore, in some cases a risk assessment involves a cost/risk analysis to establish which of various proposed control options is the most cost/risk effective.

So far as practicable

This means that the risk control measures adopted must reflect whatever is currently technically possible - regardless of the cost and inconvenience to the employer. It is, therefore, a higher standard than that required by "so far as reasonably practicable".

Best practicable means

Normally when a risk must be controlled by "best practicable means" the appropriate regulating authority indicates what it considers to be the "best practicable means" of control. Often this is done in consultation with professional bodies or industrial organisations and the results are published either as guidance or as a code of practice. Generally, "best practicable means" takes both technical and cost factors into account but, in the end, whether or not the best practicable means have been adopted will, once again, be decided by the circumstances surrounding each individual case and, ultimately, by the courts.

Performance Indicators

Once a risk assessment has been carried out and the objectives for the school have been identified, the next step is to lay down performance indicators against which progress towards each objective can be assessed. In practice, performance indicators are often no more than a description of what it is expected will have been achieved by the time an objective has been reached. However, to be useful performance indicators should be able to be quantified or assessed against some meaningful yardstick. They should also reflect the priorities, which have been discovered by the risk assessment.

EMERGENCY PLANNING

Policies deal in principles. They are strategic statements of what it is desired to achieve. They aim for ideals that are not subject to rapid change. A policy statement is not a declaration of intent. It is an opportunity to clarify the relationship between each objective and what it will achieve. Policy statements are not concerned with how this is to be accomplished. Putting a policy into action is an operational matter which should be detailed in a separate planning document, which:

- details priorities
- covers the allocation of tasks and resources
- gives timings for the execution of each task
- lays down the channels for command, control and communication
- identifies training standards
- specifies performance standards
- is supported by detailed administrative systems.

The planning document should form an appendix to the policy statement. Changes can be made to it as required and should be reported to the governing body at the earliest opportunity.

Emergency Plans

Plans to deal with emergencies are a requirement of the Health and Safety at Work etc Act 1974. Most emergencies are related to health and safety and coping with them and their aftermath is part of an effective health and safety strategy.

Contingency or emergency planning is the ultimate risk control measure. Its primary purpose is to ensure personal safety in an emergency.

An emergency might occur because:

- the risk was not foreseen
- the state of knowledge at the time the risk assessment was carried out did not allow the risk to be identified
- the risk assessment was inaccurate
- an inappropriate risk control measure was selected
- the risk control measure was poorly implemented
- of a mechanical failure
- of a malicious act
- of an act of God.

Whatever the cause, when an incident that results in injury, harm or loss occurs or looks likely to occur, the immediate response must be to minimise its consequences. The priorities are as follows.

- Save life.
- Prevent or minimise injuries.
- Safeguard property.

Safeguarding property come a poor third unless it directly contributes to either of the first two priorities. For example, the first aim of a fire drill is to ensure that, in the event of a real fire, everyone is in a place of safety as quickly as possible and that arrangements are in place which allow the prompt treatment of any injuries. Only when this is in hand should attention turn to saving the school.

Once the immediate actions have been taken, then it is necessary to consider the short-term actions, which can be carried out in order to minimise the disruption. The long-term plan to restore lost accommodation and/or facilities can then be implemented.

Most schools consider that the termly fire drill meets the requirement for emergency planning, outthought should really be given to other types of emergency which might occur, such as a bomb scare or an intruder on the premises. It might be useful to consider whether the existing or proposed procedures would cope with the confusion and uncertainty of a genuine emergency rather than the ritual of a practice. Fire drills are a good example where practice can have a tendency towards ritual.

For example, what should happen in the following situations?

- If a teacher discovers a fire, is his or her first responsibility to make sure that pupils are taken to a place of safety, or is it to fight the fire? The answer seems obvious. The teacher should ensure the safety of the pupils. However, what if it is a small fire in a waste-paper bin, which could be put out easily? Could extinguish this fire be regarded as securing the safety of the pupils? If the answer is that teachers may fight small fires, when does a small fire become too big to fight? Giving teachers discretion could lead to dangerous delays in evacuating the building.
- When teachers take their classes to a place of safety do they lead from the front? If they do, how do they ensure that the children at the back do not become detached from the rest of the group? If they guide their classes to safety from the rear, do they rely upon the children at the front to choose the best route to safety? These points may appear academic until the answers have to be found in smoke-filled corridors.

- When the building is being evacuated, who looks after staff and pupils with mobility difficulties? Do they need one-to-one assistance? If they do, who will provide it? If they are in a wheelchair and on an upper floor, how do they get out of the building? Remember that no one should use the lifts when there is a fire because of the risk of becoming trapped.
- If there is no form of access control, how does the person in charge of ensuring that everyone is out of the building know that all visitors are safely out of the building?

In addition to holding the termly fire drill where a full evacuation is carried out, it is a good idea to rehearse one particular aspect of the evacuation procedure each term. A debriefing to discover what lessons can be learnt and what improvements should be made can follow this. In this way every aspect of the evacuation procedures can be examined in detail, with the drills becoming progressively more complicated until they approximate to the conditions that would be found in a real emergency. A similar approach should be taken towards planning for other emergencies, such as bomb scares.

For this reason the test running of evacuation procedures should be referred to as an emergency drill, not a fire drill. Referring to the process as an emergency drill helps both staff and pupils to remember that fire is not the only hazard, which might require the building to be evacuated. Further details can be found in section 3.2.

Ten Phases of Any Major Incident

It is possible to distinguish ten phases in any major incident.

Pre-incident

- Phase 1 - the identification and assessment of the risk.
- Phase 2 - the selection and implementation of risk control measures.

During incident

- Phase 3 - whole or partial failure or complete absence of risk control measures results in an incident.
- Phase 4 - saving life.
- Phase 5 - preventing injury.
- Phase 6 - containing or minimising the immediate hazard.

Post incident

- Phase 7 - eliminating the hazard.
- Phase 8 - minimising property and/or equipment loss.
- Phase 9 - minimising disruption.
- Phase 10 - restoring lost accommodation and/or facilities.

The pre-incident activities are part of the normal routine of health and safety management. The risk control measures, which are introduced, should not stop at attempting to prevent the incident. They should also cover the actions, which should be taken in order to deal with the risk should it occur.

Contingency Plans

Major incidents nearly always involve disruption to normal routines and, possibly, the loss of the usual channels of communication and command and control. Individual initiative is important, but to be effective it must be purposeful. Hence response of the schools staff and pupils to a major incident must be planned. It is very important to do the above during the pre-incident phase as part of the normal risk assessment, because of the inability to stop and plan during the incident.

A contingency plan is more likely to be successful if it has been rehearsed. As with every other aspect of health and safety, it has performance standards and training requirements which need to be identified.

A contingency plan should include the following.

- 1 It should identify likely major incidents. The range of incidents is likely to vary from school to school.
2. It should identify the probable consequences. Every major incident has a range of consequences and it is probably wiser to consider a range of outcomes of varying severity rather than to focus on the worst case scenario.
3. It should evaluate and then rehearse possible responses. These should be in keeping with the consequences. The same class of incident may have a number of responses depending on its scale. This includes identifying:
 - the circumstances in which the contingency plan is to be initiated
 - the immediate actions to be taken
 - the most appropriate command and control structures and methods of communication
 - the roles of the various members of staff, emergency services and other agencies.

Apart from the absolute necessity to save life and prevent injury, the response to most emergencies should reflect the need to:

- take control - in an emergency only one person can be in command and this may be someone from outside the school, e.g. a fire service officer
- collect information - it is vital to know what is happening and to adjust any response accordingly
- impose order and direction.

Communication

Normal methods of communication may not be available for use in an emergency and contingency plans should include arrangements for alternative methods of communication, both within the school and between the school and any outside services, which may be required.

It is worth remembering that incidents are likely to get immediate publicity, which can make the situation worse. LEA-maintained schools have access to their local authority's press office and in an emergency situation this should be taken advantage of. Grant-maintained, independent, voluntary-aided schools and CTCs need to develop their own system for use in such situations.

Once an action plan (including any contingency procedures) for a safe and healthy school has been prepared then it is necessary to explain it to those who will have the job of implementing its various components. At this stage, their comments and suggestions should be invited. It is surprising how those staff closest to the action can throw the spotlight on points, which would otherwise be overlooked.

Allocation of Responsibilities

At a very early stage it is necessary to clarify the roles played by different individuals and organisations. The Education Reform Act 1988 makes the LEA, as the employer, responsible for health and safety in local authority schools. This role is essentially supervisory and advisory. The day-to-day management of health and safety issues falls on the "person in charge of the workplace". This is usually the Head, who is answerable to the governing body or LEA, as the employer, for how that responsibility is discharged. The governing body must receive a copy of the health and safety policy, even if it is not the employer.

In voluntary-aided, grant-maintained and independent schools and CTCs the governing body is the employer and the division of responsibilities between the governing body and the LEA does not exist. The governing body is responsible for all aspects of health and safety. In practice, there may be very little difference between the different types of school. In every case, the governing body should approve the health and safety policy and the Head should implement it.

Part of the planning process is to clarify the role to be played by each member of staff. For the most part this is likely to follow the normal hierarchy of the school.

The Health and Safety Co-ordinator

It is likely that the Head will be delegated by the governing body to make decisions concerning who is responsible for the day-to-day management of health and safety. The Head may choose to keep that responsibility or to give a senior member of the school's management team, directly answerable to the Head, the task of overseeing the day-to-day management of health and safety throughout the school.

Heads of Department

Each head of department may be the competent person for his or her department and may be given the task of detailing how he or she intends to discharge that duty. For further details on competency see *Management of Health and Safety at Work Regulations 1999*. Almost certainly this involves negotiating the delegation of assignments to the members of staff in each department, with individual class teachers looking after their classroom or teaching area.

Health and Safety Management Team

The school health and safety management team should provide a forum where health and safety issues can be discussed (see guide to management structure). The principal difference between the way this structure operates in a secondary school and the way it operates in a primary school is that there is fewer staff available to cover the tasks in a primary school. Therefore, in a primary school, each member of staff might be offered more than one area of responsibility. The majority of schools have a health and safety committee or a working party, which includes health and safety in its brief, and this, could form the basis for this group. The health and safety management team should concern itself with the management and personnel issues of health and safety, not sites and building-related matters.

Staff Health and Safety Representatives

Staff health and safety representatives can serve on the health and safety committee or, if the governing body invites them to do so, they may serve on its health and safety subcommittee. Staff health and safety representatives do not carry any management responsibility and must not be made to feel that they do.

Areas of Responsibility

Allocating overall responsibility for generic tasks to individuals should be done with great care if it is done at all. Some responsibilities like those attached to the Control of Substances Hazardous to Health Regulations 1999 and the Electricity at Work Regulations 1989 (See section 1 for further details), cut across individuals and departments. The caretaker is as likely to make assessments under the Control of Substances Hazardous to Health Regulations 1999 as the head of science is. Virtually every member of staff is likely to use portable electrical appliances and should be aware of the importance of the Electricity at Work Regulations 1989. At some time most staff are likely to use a computer and, although they are not likely to be considered "users", it is suggested that they should be aware of the requirements of the Health and Safety (Display Screen Equipment) Regulations 1992 (see section 1 for the definition of "user").

Making one member of staff responsible for an area, such as risk assessments under the Control of Substances Hazardous to Health Regulations 1999, carries the risk that either the person responsible may be unaware of the full scope of its application in the school, or that other members of staff who should know about its impact on their activities remain in ignorance. Either way there is a risk that unsafe practice may be allowed to continue unchecked.

Specialist Advice

Although there is much that a school can do from its own resources, from time to time it is necessary to draw upon technical or professional expertise from outside the school. This may be necessary if there is no competent person within the school. These areas should be identified and the appropriate advice should be sought in good time. Advice may be sought from the Education Department or external consultants. Whoever is consulted, the governing body must be satisfied that the specialist has the necessary expertise.

Command and Control

When a plan is being implemented, staff should not be left to their own devices or to make decisions, as they feel best. Nor must it be assumed that they will inform their line manager when matters pass out of their area of competence. It is essential that there are clear and unambiguous guidelines on the channels for command and control and that all staff are aware of their existence.

However, if staff make decisions as they are needed and inform their line managers of their actions, moral is likely to be enhanced and staff are able to "own" the decisions. This means they are more likely to co-operate with each other. Therefore, it is suggested that staff be allowed to make decisions within their level of competence and that they are aware of where to go for guidance when decisions are beyond this level.

Decisions are only as good as the information, which is available when they are made. It is impossible to separate communication from intelligent command and control. Information, views and opinions must pass rapidly and freely between staff at all levels. Good communication not only gives all staff an input into health and safety issues, it makes the widest possible range of information, expertise and experience available to the decision-making process. Indeed, the provision of information to staff is a requirement of the Management of Health and Safety at Work Regulations 1999

Health and Safety Training

Once staff have accepted areas of responsibility, they must receive appropriate training to enable them to discharge their duties competently.

On appointment, all staff, including part-time, temporary and supply staff, should be given access to the school policy document. They must be offered health and safety training in order to familiarise themselves with the following.

- The school's health and safety policy and its implementation.
- The statutory background to health and safety.
- The major hazards which exist in the school.
- The concept of risk assessment.
- Safe working methods and accident prevention procedures.
- Fire and emergency procedures.
- First aid arrangements.

The basic training should form part of the induction training of all new members of staff. However, training should be progressive. The additional training needs of each member of staff (such as training relating to the Control of Substances Hazardous to Health Regulations 1999) in first-aid or swimming pool maintenance) should be identified and arrangements should be made for them to be met.

A record should be kept of the training, which is given to all members of staff, and, when necessary, refresher and updating training should be given. In some areas, such as first-aid, refresher training is a requirement. As a general rule, any change in organisation, working practices, equipment or legislation requires a review of training requirements for all staff. A form, which allows all training provision for each member of staff to be recorded, is included. Forms, which relate to specialist training, eg: food hygiene, are included in the relevant sections, eg: *Kitchens and Dining Rooms*.

In industry and business, health and safety training is only given to employees. The position in schools is different. Under ss. 3-4 of the Health and Safety at Work etc Act 1974, pupils fall into the same category as visitors in commercial or industrial premises. However, they are often required to carry out tasks that, if they were employees, could only be done after they had received the appropriate health and safety training.

Usually pupils carry out these tasks under a level of supervision, which could be regarded as a form of training. However, the degree of supervision, particularly of older pupils, is sometimes no greater than that which is given to an employee in an industrial or commercial environment. It is prudent to consider whether there are any areas where it is necessary to extend the identification of training needs to include pupils. For example, where a risk to health and safety exists or where specific risk control measures are required, such as carrying heavy equipment or the use of personal protective equipment. All the pupils involved should receive appropriate health and safety training before beginning the work. Codes of practice in areas such as science should include rules for pupils and schemes of work should identify the training, which they require

The training requirements for some emergency procedures, such as emergency drills, should automatically include pupils.

All requests for training should be directed to the Principal Personnel Officer in the Education Department.

Dual Use

Occasional

Most schools hire out space and facilities at evenings and weekends. These activities should be identified in the course of the overall risk assessment, as should any risk they pose to staff, pupils, and visitors or to that taking part.

Normally only part of the school is open for out-of-hours use. For security reasons, the rest remains locked. Care should be taken to ensure that this does not interfere with the emergency evacuation routes from the area in use. The risk assessment should also take into account the fact that those using the building are probably less familiar with its layout and any permanent or short-term hazards than the staff and pupils. There should be signs to mark the emergency exits and hazards (see *Safety Signs and Signals Regulations 1996*).

Although on such occasions the management of the school has little or no direct control over the activities that take place, it is possible that in the event of an accident the school authorities may be asked to demonstrate that they had taken steps to satisfy themselves that the activities were being conducted safely.

Some hirers engage in activities which carry a higher than normal risk of personal injury. Most sporting activities fall into this category. Any school facilities, such as gymnastic apparatus, which are used in the course of these activities, should be checked beforehand to ensure that they are suitable for the purpose for which they are to be used and that they are in a serviceable condition. This should include confirming before a game that playing fields are free of any debris, which may cause injury. It is advisable to arrange for hirers to sign the inspection report, thus indicating that they agree that the check has been made and that the facilities are acceptable

Hirers who offer instruction or training in activities which carry a higher than normal risk should be able to demonstrate that they are using the correct equipment and that their instructors hold the appropriate qualifications before they are allowed to use the facilities.

Some hirers supplement the school's facilities with their own. This is especially true of amateur dramatic groups who often bring in additional lighting and sound equipment. It is prudent to seek assurances that the equipment:

- complies with all statutory and advisory standards in its design and construction
- is in good condition
- is compatible with the school's facilities
- does not impose excessive or dangerous loads on either the structure of the building or its services
- will only be put to its designed use
- is used only by qualified personnel.

Some hirers require a public entertainment license. This usually imposes conditions which:

- limit the numbers in the audience
- impose restrictions on the type and layout of the seating arrangements
- specify the number and position of emergency exits
- require emergency lighting, which includes illumination of the signs marking the exits.

The management of the school should ensure that on each occasion the necessary licenses are applied for and that arrangements are made for their conditions to be met in full.

It might be necessary for the management of the school to require hirers to take out insurance, which covers it against any claim, which may arise from their activities.

For further details on dual use see *Checklist: Fire Safety Inspection Prior to Public Admission*.

Long-term

In some schools shared use of accommodation and facilities is long-term. This is often the case in community schools where responsibility for the community activities lies with a separate group. Normally this group is answerable to the governing body and it is sufficient that representatives from it are members of the health and safety management team. In this way the community activities are treated like those of any school department.

The situation is different when the other users are answerable to some authority other than the management of the school. For example, this includes services such as public libraries, school meals, caretaking and cleaning, especially where private contractors run these. These organisations should have their own health and safety policies, which reflect their circumstances and activities. However, the implementation of these policies should be co-ordinated with the school management's policy.

POLICY FRAMEWORK

Each governing body should have its own health and safety policy tailored to meet its particular circumstances. The difficulty for governing bodies without a policy is where to start. The model at the end of this section is intended to provide a guide. Areas where it does not satisfactorily reflect the needs or philosophy of the management of the school will soon become apparent. It may be necessary to change an emphasis, or it may be necessary to rewrite an entire section. If it can be avoided, changes should not be made, as the need for them becomes apparent. Instead, the policy should be reviewed annually and any changes, which are required, should only be made after consultation with all the parties involved. Such consultation offers staff the opportunity to "own" the policy. The governing body should approve any changes before they are made. A copy of the approved policy should be sent to the LEA for its information.

In the past, it was not uncommon for the management of a school to rely on its LEA, as the employer, to provide a written health and safety policy statement. This was not always wise. This may not have mentioned schools at all. If the LEA had a written health and safety policy, then, more often than not; it reflected the needs of the department rather than those of its schools

AGREEING A MANAGEMENT STRATEGY TO IMPLEMENT THE POLICY

This revolves around identifying the various areas of responsibility for carrying out schools' policy.

ALLOCATING RESPONSIBILITIES

Individuals are offered and agree to accept responsibilities and associated tasks. Be clear about what you wish/urge people to do and you must describe who does what by job title – this avoids costly re-printing when staff change. Be clear about what happens if key people are absent - this must be part of your organisation/procedures.

IDENTIFYING AND MEETING TRAINING NEEDS

For members of staff to carry out their responsibilities it is necessary to ensure that they have the appropriate knowledge and skills to the required standard. Any shortfall should become part of the training programme.

CARRYING OUT THE CHECKS AND PROCEDURES

The records and procedures are intended to help with this task and should be carried out by competent persons. The extent and frequency of records kept and procedures followed should be checks, so that the best way of remedying any defects and deficiencies can be identified.

MONITORING AND REVIEW

Maintaining and reviewing how your health and safety policy is working is a constant process. Much of good health and safety practice revolves around using past experience and events to prevent future incidents. The use of written records quickly builds up into a source of hard fact on which to base these judgements.

PREPARING A POLICY STATEMENT

It is recommended that every school has its own written health and safety policy statement. When preparing your policy do use a language style which is suitable for the easy understanding of all those staff employed on your site.

If you already have a procedure in place which works and is part of another document, then cross reference it but ensure that at least three complete reference sets (Head Teacher copy, office copy, staff reference copy) are maintained. Reference sets are useful for reviews and inspections.

Wherever possible, include the expected level of performance eg: 'X will be checked every week' or 'the consultative group will meet every month'.

The legislation requires that all staff have access to all policies, procedures etc. It is suggested that staff are issued only with the sections which are relevant to them. This usually means that all members of staff receive a basic set plus relevant specialist items and have access to one of the reference sets.

The health and safety policy statement should contain information of how the school's aims and objectives are to be achieved. This should be couched in general terms in order to cover the entire range of activities and situations, which may be found in a school. Yet, in order to be relevant, the arrangements, which should be used for its execution, must be described specifically.

Duties and organisational arrangements should be described by specific titles, eg: 'school fire safety officer' or 'first-aider'. The names of those who agree to hold these positions can then be given in separate appendices so that staff changes do not result in a full-scale policy review.

Good health and safety policies:

- aim for the ideal of a healthy, incident-free workplace
- indicate the organisation and other arrangements for carrying out the policy
- emphasise the importance of individual safety and the role played by individuals in creating a safe and healthy workplace
- recognise the relationship which exists between the control of risks and the health and safety of staff, pupils and others
- acknowledge the importance of health and safety to the overall success of the school
- reflect the spirit rather than the letter of the statutory requirements.

This does not mean that policies, which have these features and are working towards a common agreed ideal, are interchangeable between schools. They are not. The shape and form of each policy grows out of:

- the aim of the school's management
- the objectives which the management of the school set and the results of any risk assessments which are carried out
- the organisation and ethos of the particular school.

Bracknell Forest Borough Council's Health, Safety and Welfare Manual of Guidance Section 4 sets out guidance on producing a local policy. It is recommended that the school produces a safety policy statement along the same lines. The Council and the Education Department have issued their own policy statements which are available to schools.

A model policy that can be used by any local authority school is included in this section. This should be supplemented by a series of separate appendices, which detail the operational measures in place to implement the policy statement. These fall into two broad categories organisation and procedural.

• Organisational

This appendix to the health and safety policy should outline the arrangements and give the names of the staff who currently have agreed areas of responsibility. This is likely to include the Head teacher, the member of staff in charge of health and safety (the health and safety co-ordinator), heads of department and those members of staff with specific duties, such as first-aiders. A useful guide to the type of management structure which could be adopted is included in this section.

• Procedural

This appendix to the health and safety policy should include statements of methods of work, routines and procedures and codes of practice which cover subjects such as the following.

- emergency procedures;
- contingency plans;
- school trips;
- first-aid;
- administration of medication;
- vehicle movement within school premises;
- health and safety training - recognition of needs, arrangements for training and record keeping;
- storage of flammable materials;
- storage of hazardous materials;
- waste disposal - laboratory material (chemicals, broken glass, etc) and clinical waste;
- accident or incident procedures - by whom and to whom;
- contractors (especially for construction work);
- dual use;
- general fire safety;
- housekeeping (including cleaning) eg: frequency, standards and monitoring arrangements;
- provision of advice and consultants' services - from whom and when;
- arrangements for safety representatives and safety committees;
- inspection, examination and maintenance work - preventative, reactive and planned – for example:
 - a) control of Substances Hazardous to Health Regulations (COSHH);
 - b) the Electricity at Work Regulations;
 - c) the Ionising Radiation Regulation;
 - d) display Screen Equipment Regulations (DSE);
 - e) manual Handling Regulations;
 - f) the Provision and Use of Work Equipment Regulations.
- dealing with asbestos sealing and removal, and asbestos recognition;
- playground/play equipment safety;
- safety on school transport;
- local rules for departments, eg: safe laboratory practice in the chemistry department;
- work experience arrangements;
- letting school premises to outside hirers and visitor arrangements;
- dealing with violence to staff and pupils in school.

Guidance on the above subjects is contained in sections of this publication or available from the Safety Adviser, Public and Environmental Services.

Records

A further appendix to the health and safety policy should include a reference to where records are available within the school of the following:

- staff training;
- risk assessments, eg: COSHH, DSE, fire, manual handling;
- audit and monitoring inspections;
- accidents or incidents;
- reviews.

MODEL HEALTH AND SAFETY POLICY FOR SCHOOL

GENERAL

The governing body ofSchool recognises that the ultimate responsibility for the implementation of the Health and Safety Policy within the school is theirs. The governing body notes the provisions of Section 3(1) of the Health and Safety at Work, etc Act 1974, which states that it is the duty of every employer to conduct his or her undertaking in such a way as to ensure, so far as is reasonably practicable, that persons not in his or her employment who may be affected by it are not exposed to risks to their health and safety. The governing body accepts that it has a responsibility to take all reasonably practicable steps to secure the health and safety of pupils, staff and others using the school premises or participating in school-sponsored activities. It believes that the prevention of accidents, injury or loss is essential to the efficient operation of the school and is part of the good education of its pupils.

The aim of the governing body is "To provide a safe and healthy working and learning environment for staff, pupils and visitors."

The arrangements outlined in this statement and the various other safety provisions made by the governing body cannot prevent accidents or ensure safe and healthy working conditions. The governing body believes that only the adoption of safe methods of work and good practice by every individual can ensure everyone's personal health and safety. The governing body will take all reasonable steps to identify and reduce hazards to a minimum. However all staff and pupils must appreciate that their own safety and that of others also depends on their individual conduct and vigilance while on the school premises or while taking part in school-sponsored activities.

This Health and Safety Policy Statement and related arrangements for implementation are not a substitute for the above mentioned legislation, Bracknell Forest Borough Council and Education Department policy safety guidelines, but are complementary and have been formulated to reflect our schools own needs.

This statement supplements the Health and Safety Policy Statements written by Bracknell Forest Borough Council and by the Education Department. Copies of these statements, policies and the Bracknell Forest Borough Council Health, Safety and Welfare Manual of Guidance are available in the Office.

THE DUTIES OF THE GOVERNING BODY

It is the policy of the Governing Body, as far as it is reasonably practicable, through delegation to the head teacher to:

- make itself familiar with the Councils and the Education Departments Health and Safety policy Statements, Bracknell Forest Borough Council's Health, Safety and Welfare Manual of Guidance and the requirements of the Health and Safety at Work etc Act 1974 and any other health and safety legislation and codes of practices which are relevant to the work of the school, in particular the Management of Health and Safety at Work Regulations 1999;
- ensure that there is an effective and enforceable policy for the provision of health and safety throughout the school;
- periodically assess the effectiveness of this policy and ensure that any necessary changes are made;

- identify and evaluate all risks relating to:
 - a) accidents;
 - b) health;
 - c) school-sponsored activities (including work experience).
- identify and evaluate risk control measures in order to select the most appropriate means of minimising risk to staff, pupils and others;
- create and monitor the management structure.

In particular the governing body undertakes to provide:

- a safe place for staff and pupils to work including safe means of entry and exit;
- plant, equipment and systems of work which are safe;
- safe arrangements for the handling, storage and transport of articles and substances;
- safe and healthy working conditions which take account of all appropriate:
 - a) statutory requirements;
 - b) codes of practice whether statutory or advisory;
 - c) guidance whether statutory or advisory;
- supervision, training and instruction so that all staff and pupils can perform their school-related activities in a healthy and safe manner. All staff will be offered the opportunity to receive health and safety training which is appropriate to their duties and responsibilities and which will be given before an employee commences any relevant work. Wherever training is required by statute or considered necessary for the safety of staff, pupils and others then the governing body will ensure, within the financial resources available, that such training is provided. Pupils will receive such training as is considered appropriate to the school-related activities which they are carrying out. All training will be regularly updated;
- necessary safety and protective equipment and clothing together with any necessary guidance, instruction and supervision;
- adequate welfare facilities.

So far as is reasonably practicable the governing body, through the head teacher, will make arrangements for all staff, including temporary and voluntary staff and helpers and those on fixed-term contracts to receive comprehensive information on:

- this policy;
- all other relevant health and safety matters;
- the instruction and training that will be given to all employees so that they may carry out their duties in a safe manner without placing themselves or others at risk.

THE DUTIES OF THE HEAD TEACHER

As well as the general duties which all members of staff have, the head teacher has responsibility for the day-to-day maintenance and development of safe working practices. Also conditions for teaching staff, non-teaching staff, ancillary staff, pupils, visitors and any other person using the premises or engaged in activities sponsored by the school. Head teachers will take all reasonably practicable steps to achieve this end through heads of the appropriate departments, senior members of staff, teachers and others as appropriate.

The head teacher is required to take all necessary and appropriate action to ensure that the requirements of all relevant legislation, codes of practice and guidelines are met in full at all times.

In particular, the head teacher will:

- be familiar with the Council's and the Education Departments Health and Safety Policy Statements, Bracknell Forest Borough Council's Health, Safety and Welfare Manual of Guidance and the requirements of the Health and Safety at Work etc Act 1974 and any other health and safety legislation and codes of practices relevant to the work of the school;
- ensure, at all times, the health, safety and welfare of staff, pupils and others using the school premises or facilities or services or attending or taking part in school-sponsored activities;
- ensure safe working conditions for the health, safety and welfare of staff, pupils and others using the school premises and facilities;
- ensure safe working practices and procedures throughout the school including those relating to the provision and use of machinery and other apparatus, so that each task is carried out to the required standards and so that all risks are controlled;
- consult with members of staff, including the safety representatives, on health and safety issues;
- arrange systems of risk assessment to allow the prompt identification of potential hazards;
- carry out periodic reviews and safety audits on the findings of the risk assessment;
- identify the training needs of staff and pupils and ensure, within the financial resources available, that all members of staff and pupils who have identified training needs receive adequate and appropriate training and instruction in health and safety matters;
- encourage staff, pupils and others to promote health and safety;
- ensure that any defects in the premises, its plant, equipment or facilities which relate to or may affect the health and safety of staff, pupils and others are made safe without delay;
- encourage all employees to suggest ways and means of reducing risks;
- collate accident and incident information and, when necessary, carry out accident and incident investigations;

- monitor the standard of health and safety throughout the school, including all school-based activities, encourage staff, pupils and others to achieve the highest possible standards and discipline those who consistently fail to consider their own well-being or the health and safety of others;
- monitor first-aid and welfare provision;
- monitor the management structure, along with the governors.

THE DUTIES OF SUPERVISORY STAFF

All supervisory staff (eg: head teachers of departments, co-ordinators, science technicians) will make themselves familiar with the Councils and the Education Departments Health and Safety policy Statements, Bracknell Forest Borough Council's Health, Safety and Welfare Manual of Guidance and the requirements of the Health and Safety at Work etc Act 1974 and any other health and safety legislation and codes of practice which are relevant to the work of their area of responsibility.

In addition to the general duties which all members of staff have, they will be directly responsible to the head teacher or the 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.

They will take a direct interest in the school's health and safety policy and in helping other members of staff, pupils and others to comply with its requirements.

As part of their day-to-day responsibilities they will ensure that:

- safe methods of working exist and are implemented throughout their department;
- health and safety regulations, rules, procedures and codes of practice are being applied effectively;
- staff, pupils and others under their jurisdiction are instructed in safe working practices;
- new employees working within their department are given instruction in safe working practices;
- regular safety inspections are made of their area of responsibility as required by the head teacher or as necessary;
- positive, corrective action is taken where necessary to ensure the health and safety of all staff, pupils and others;
- all plant, machinery and equipment in the department in which they work is adequately guarded;
- all plant, machinery and equipment in the department in which they work is in good and safe working order;

- all reasonably practicable steps are taken to prevent the unauthorised or improper use of all plant, machinery and equipment in the department in which they work;
- appropriate protective clothing and equipment, first-aid and fire appliances are provided and readily available in the department in which they work;
- toxic, hazardous and highly flammable substances in the department in which they work are correctly used, stored and labelled;
- they monitor the standard of health and safety throughout the department in which they work, encourage staff, pupils and others to achieve the highest possible standards of health and safety and discipline those who consistently fail to consider their own well-being or the health and safety of others;
- all the signs used meet the statutory requirements;
- all health and safety information is communicated to the relevant persons;
- they report, as appropriate, any health and safety concerns to the appropriate individual.

THE DUTIES OF ALL MEMBERS OF STAFF

All staff will make themselves familiar with the requirements of the Health and Safety at Work etc Act 1974 and any other health and safety legislation and codes of practice which are relevant to the work of the department in which they work. They should:

- take reasonable care of their own health and safety and any other persons who may be affected by their acts or omissions at work;
- as regards any duty or requirements imposed on his or her employer or any other persons by or under any of the relevant statutory provisions, co-operate with him or her so far as necessary to enable that duty or requirement to be performed or complied with.

All staff are expected to familiarise themselves with the health and safety aspects of their work and to avoid conduct which would put them or anyone else at risk.

In particular all members of staff will:

- be familiar with the safety policy and any and all safety regulations as laid down by the governing body;
- ensure health and safety regulations, rules, routines and procedures are being applied effectively by both staff and pupils;
- see that all plant, machinery and equipment is adequately guarded;
- see that all plant, machinery and equipment is in good and safe working order;
- not make unauthorised or improper use of plant, machinery and equipment;
- use the correct equipment and tools for the job and any protective equipment or safety devices which may be supplied;

- ensure that toxic, hazardous and highly flammable substances are correctly used, stored and labelled;
- report any defects in the premises, plant, equipment and facilities which they observe;
- take an active interest in promoting health and safety and suggest ways of reducing risks.
- **HIRERS, CONTRACTORS AND OTHERS**

When the premises are used for purposes not under the direction of the head teacher then the principal person in charge of the activities for which the premises are in use will have responsibility for safe practices as indicated in paragraph 3.0 of this document.

The head teacher or the co-ordinator will seek to ensure that hirers, contractors and others who use the school premises conduct themselves and carry out their operations in such a manner that all statutory and advisory safety requirements are met at all times.

When the school premises or facilities are being used out of normal school hours for a school-sponsored activity then, for the purposes of this policy, the organiser of that activity, even if an employee will be treated as a hirer and will comply with the requirements of this section.

When the premises are hired to persons outside the employ of the governing body, it will be a condition for all hirers, contractors and others using the school premises or facilities that they are familiar with this policy. That they comply with all safety directives of the governing body and will not without prior consent of the governing body:

- introduce equipment for use on the school premises;
- alter fixed installations;
- remove fire and safety notices or equipment;
- take any action that may create hazards for persons using the premises or the staff or pupils of the school.

All contractors who work on the school premises are required to ensure safe working practices by their own employees under the provisions of the Health and Safety at Work etc Act 1974 and must pay due regard to the safety of all persons using the premises in accordance with ss.3-4 of the Health and Safety at Work etc Act 1974.

In instances where the contractor creates hazardous conditions and refuses to eliminate them or to take action to make them safe the head teacher will take such actions as are necessary to prevent persons in his or her care from risk of injury.

The governing body draws the attention of all users of the school premises (including hirers and contractors) to s.8 of the Health and Safety at Work etc Act 1974, which states that no person shall intentionally or recklessly interfere with or misuse anything which is provided in the interests of health, safety or welfare in pursuance of any of the relevant statutory provisions.

STAFF CONSULTATIVE ARRANGEMENTS

The governing body, through the Head teacher, will make arrangements for the establishment of a safety committee by incorporating agenda items on health and safety matters into existing consultative groups. Representation on this committee will cover all appropriate areas of work or special hazards. As a group, the nominated safety representatives of each accredited trade union or staff association will be offered a number of places on this committee and should decide amongst themselves which individuals should sit on the committee.

CODES OF PRACTICE, SAFETY RULES AND GUIDANCE NOTES

In consultation with the governing body (where appropriate) and taking into account the requirements of this statement the safety committee will approve (where necessary) codes of practice for the observation of safety requirements in school.

From time to time the Department for Education and Employment (DfEE), Health and Safety Executive (HSE), Director of Public and Environmental Services, Director of the Education Department and other regulatory or advisory bodies will issue codes of practice or guidance notes on particular topics to assist head teachers and others who are in control of educational premises. Normally such codes will be incorporated into the health and safety policy and procedures. If the head teacher considers the inclusion of all or any such documents into this policy to be inappropriate, he or she will be required to demonstrate to the satisfaction of the governing body that he or she has already introduced codes of practice and methods of working which achieve a similar or higher standard of health and safety.

RISK ASSESSMENT

The head teacher will ensure that a risk assessment survey of the premises, methods of work and all school-sponsored activities is conducted annually (or more frequently, if necessary). This survey will identify all defects and deficiencies, together with the necessary remedial action or risk control measures. The results of all such surveys will be reported to the governing body.

EMERGENCY PLANS

The head teacher will ensure that an emergency plan is prepared to cover all foreseeable major incidents which could put at risk the occupants or users of the school. This plan will indicate the actions to be taken in the event of a major incident so that everything possible is done to:

- save life
- prevent injury
- minimise loss

The above sequence will determine the priorities of the emergency plan.

The plan will be agreed by the governing body and be regularly rehearsed by staff and pupils. The result of all such rehearsals will form part of the regular risk assessment survey and the outcome will be reported to the governing body.

FIRST-AID

The arrangements for first-aid provision will be adequate to cope with all foreseeable major incidents.

The number of certificated first-aiders will not, at any time, be less than the number required by law.

At the discretion of the governing body other staff will be given such training in first-aid techniques as is required to give them a basic, minimum level of competence. This level will be agreed by the governing body after seeking appropriate advice. The number of such trained but uncertificated first-aiders will be determined by the governing body as that being sufficient to meet the needs of all foreseeable circumstances.

Supplies of first-aid material will be held at various locations throughout the school. The head teacher will determine these locations. They will be prominently marked and all staff will be advised of their position. The materials will be checked regularly and any deficiencies made good without delay.

Adequate and appropriate first-aid provision will form part of the arrangements for all out-of-school activities.

A record will be made of each occasion any member of staff; pupil or other person receives first-aid treatment either on the school premises or as part of a school-related activity.

REVIEW

The governing body will review this policy statement annually and update, modify or amend it, as it considers necessary to ensure the health, safety and welfare of staff and pupils.

Signed:
(For the governing body)

Date:

Signed:
(Head Teacher)

Date:

GUIDE TO MANAGEMENT STRUCTURE

