



HEALTH AND SAFETY POLICY

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Governor: Mr A Dixon

*** Policy Review: Annually unless otherwise dictated by the FGB (Full Governing Body) or by changes in legislation.**

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INTRODUCTION

The prevention of accidents and ill health is one of the most important functions of management because:

- Tower College does not want any employee or other person to suffer as a result of our work
- Tower College as an employer is required to comply with all Health, Safety and Welfare legislation, and
- Tower College recognises that accidents, unsafe and unhealthy working conditions can be a considerable drain on the financial resources of the School and demonstrate a lack of efficiency in the business.

This document has, therefore, been prepared to define the way that the School intends to manage health and safety and to meet the requirements of Section 2(3) of the Health and Safety at Work etc Act 1974, which requires an employer to prepare a statement of general policy with respect to the health and safety of employees, others not in their employment but for whom they are responsible, and the organisation and arrangement set up to carry out the policy.

It has been drawn up taking into account the requirements of the Health and Safety at Work etc Act 1974 which are summarised as follows (N.B. this is not a legal interpretation of the Act):

Employers must ensure, so far as is reasonably practicable, the health, safety and welfare at work of their employees and others not in their employment but for whom they are responsible by providing:

- *safe plant and equipment*
- *safe means of handling and transporting articles and substances*
- *adequate training, instruction, information and supervision, and*
- *a safe place of work with safe access and egress.*

Employees must look after their own health and safety and ensure that they do not endanger others. They must also co-operate with the employer to assist in meeting statutory requirements. No person must recklessly or wilfully interfere with anything provided for health and safety.

Failure to comply with the duties outlined in specific regulations for health and safety can lead to Prohibition or Improvement Notices which will interfere with the progress of work and/or lead to prosecution of the School, individual Governors, managers or employees with substantial fines for certain offences and even imprisonment.

Note that the arrangements refer to appropriate legislation and guidance which must be applied to our School. Each department may hold its own Health and Safety Policy outlining the relevant specific regulations, governing bodies and procedures which also must be followed. Any stand-alone Departmental Health and Safety documents must reflect this document.



Part 1

**TOWER COLLEGE
HEALTH AND SAFETY POLICY STATEMENT**

Background

The Health and Safety at Work etc Act 1974 places a duty of care on all employers in respect of the health, safety and welfare of their employees. Our duty extends to pupils, visitors, contractors and others who may be affected by the School’s activities. Overall responsibility lies with the Principal and Governors but day to day management responsibility is delegated to the School’s Site Manager and Bursar. Tower College gives the highest priority to ensuring that health and safety is treated as a collective responsibility, seeking to achieve exemplary standards in compliance with the 1974 Act and other related legislation. Our commitment is to ensure that health and safety is embedded in all activities undertaken by the School.

Responsibility

We have vested specific responsibilities for health and safety overview in one member of the Governing Body. As the Governor responsible for the overview of health and safety matters, Mr Karl Murphy will ensure that the School’s responsibilities are properly discharged through the Bursar and Site Manager. The Vice-Principal chairs a Health and Safety Committee, which will meet at least once every term. Each department within the School is represented on that committee, which is the formal channel for addressing health and safety issues. A termly report is reviewed by the School Governing Body and our performance is subjected to independent audit at least every three years.

Policy

It is our policy, so far as is reasonably practicable, to ensure that:

- Premises and facilities provided by the School are maintained in a safe condition
- Equipment and procedures of work, together with arrangements for use, handling and storage of articles and substances for use at work, are safe and without risk to health
- Staff are informed, trained and supervised to secure their safety and that of pupils who may be affected by their actions
- All working environments are safe and any risks to the health of staff, pupils, visitors and others are minimised, and
- Adequate arrangements are made for the welfare of all staff.

Duty of Staff

All staff members have a duty to:

- Take reasonable steps to ensure their own health and safety and that of others who may be affected by their acts or omissions at work
- Respect procedures and instructions given for the purposes of health and safety; and
- Report any concerns or breaches of the health and safety policy to their line manager or to the Health, Safety and Compliance Manager.

Signed

Principal Chair of Governors

Date Date.....

Part 2

ORGANISATION FOR HEALTH AND SAFETY Roles and Responsibilities

Overall responsibility for health, safety and welfare rests with the Principal and Governing Body but all other employees who are in any way responsible for the School's activities must take account of safety, health and welfare at all times.

All Tower College employees have health and safety responsibilities within their own working area and throughout the whole School site.

In order to minimise confusion in respect of the responsibilities of individuals or groups with regard to the Health and Safety Policy it is necessary to clearly identify those individuals and clarify their specific responsibilities.

PERSONS RESPONSIBLE FOR HEALTH AND SAFETY

The Board of Governors is responsible for:

- Preparing and keeping up to date a Statement of the School's Policy for Health, Safety and Welfare, ensuring that it is brought to the attention of employees.
- Ensuring that sound working practices are observed as laid down by Codes of Practice, and that work is planned and carried out in accordance with statutory provisions.
- Allocating funds to allow designated staff to provide information and guidance to all those involved with work activities on the School site.
- Ensuring that any employees failing to satisfactorily discharge their responsibilities for health and safety are dealt with in an appropriate manner.
- Setting an example and maintaining enthusiasm by its own behaviour and involvement in health and safety matters.

Managers/Heads of Department are responsible for:

- Ensuring that this policy and other relevant departmental policies are implemented to achieve the highest possible standard of health, safety and welfare for all persons on the site.
- Ensuring that all those responsible to them understand and discharge their responsibilities and duties in accordance with the Health and Safety at Work Act 1974 and other relevant legislation.
- Ensuring that accidents are reported and, where required, accident investigations are carried out and the reports are sent to the Principal / Site Manager / Vice Principal and Bursar.
- Ensuring that risk assessments are carried out and in place for their areas of responsibility, with evidence (signatures) that the relevant staff have received and read them.
- Ensuring that staff in their charge receive the relevant training for all aspects of their role, including an induction at the start of their employment and regular refresher training.
- Ensuring that all buildings, plant, equipment and systems of work are safe and operate within the requirements of relevant health and safety legislation.
- Ensuring regular safety inspections of the premises including plant, materials and safety procedures take place.
- Maintaining and promoting good housekeeping and general site tidiness in all working areas.
- Ensuring that articles and substances supplied on site are free from risk as far as is reasonably practicable.
- Ensuring that operations on site present no nuisance to the public or pupils, such as excessive noise.
- Ensuring that adequate consideration is given to health and safety aspects in the planning, implementation and control of operations, so that those operations will be carried out safely. Involving the Site Manager and Bursar in all aspects of those considerations, and communication is made throughout the whole process.
- Monitoring the general operation and effectiveness of this policy and ensuring that any major issues are brought to the attention of the Site Manager / Bursar.
- Setting an example and maintaining enthusiasm by their own behaviour and involvement in health and safety matters.

All Employees are responsible for:

- Ensuring that they read and understand the School's Health and Safety Policy and that they carry out their work in accordance with its requirements.
- Reading all relevant risk assessments and understanding the control measures required.
- Using the correct equipment for the job.
- Using all safety devices and equipment, where fitted, correctly.
- Wearing all safety clothing and equipment provided.
- Ensuring that any defect or damage to plant or equipment is reported to their line manager and/or the Health, Safety and Compliance Manager.
- Working in a safe manner at all times and not taking unnecessary risks that could endanger themselves or others.
- Reporting any injury to themselves which results from an accident at work, even if the injury does not stop them from working.
- Reporting near miss occurrences to their line manager and/or the Site Manager.
- Ensuring that practical jokes or 'horseplay', which may put the safety of themselves or others at risk, do not take place.
- Ensuring that others, including the general public, are protected from hazards arising from work activities.

The Site Manger and Bursar:

- Advising the School on the preparation, implementation and review of the Health, Safety and Welfare Policy including the organisation and arrangements for carrying out the Policy.
- Ensuring that up to date information is received and passed to the relevant School departments/staff.
- Assisting Heads of Department to create risk assessments for departments and general areas of the School for activities which pose significant risk to employees, pupils, visitors and contractors on site.
- Assisting Heads of Department in creating Fire Risk Assessments and Fire Plans for their departments. Assisting/undertaking termly fire evacuation drills.
- Undertaking internal audits to monitor health and safety systems on site, creating a management system for monitoring/following health and safety guidelines.
- Liaising with all employees/Heads of Department to assist/create health and safety documents, systems and procedures.
- Keeping relevant documentation and health and safety records for external inspections, Principal's 'snap checks' and the relevant enforcement officers.
- Reporting of Injuries, Disease and Dangerous Occurrence Regulations (R.I.D.D.O.R) related injuries to the Health and Safety Executive on behalf of the School.
- Delivering and/or arranging health and safety related training to staff as required.
- Giving advice to and creating reports for the Board of Governors, as requested on :
 - Legal requirements/School compliance regarding health and safety
 - Proposed changes to legislation and their potential impact on the School
- Assisting the School in any dealings with the Health and Safety Executive (HSE) or any other legislative body.
- Carrying out investigations after serious accidents/incidents.

Health and Safety Committee

The purpose of the Health and Safety Committee is to address ongoing health, safety and welfare issues associated with work activities. The Committee meets once a term under the chairmanship of the Principal. The Governor who is responsible for health, safety and welfare, attends these meetings. The members of the Committee are:

- Principal
- Vice-Principal (DSL)
- Site Manager
- Bursar
- Clerk of Works
- Heads of Dept
- Director of Sport
- Educational Visits Co-ordinator

- Grounds Manager
- Head of Catering Services
- First Aid Officer
- The Governor for Health and Safety

The role of the Committee is to:

- Discuss matters concerning health, safety and welfare.
- Review the impact of changes in regulations and the need for compliance.
- Monitor the effectiveness of health and safety within the School.
- Review accidents and near misses and discuss preventative measures.
- Review, update and promote risk assessments.
- Discuss health and safety training requirements for all School staff.
- Monitor the implementation of professional advice.
- Review the Safety Policies and Guidance and update them as required.
- Assist in the development of safety rules and safe systems of work.
- Monitor communication and publicity relating to health and safety in the workplace.
- Encourage suggestions and reporting of defects by all members of staff.

Monitoring and Review of the School's Safety Policy

All employees will be expected to bring to the notice of the Site Manager / Bursar any area where the School's Policy on health, safety and welfare appears to be inadequate. These suggestions will be considered.

At twelve monthly intervals, or as and when legislation dictates, a review audit of the School's performance in accident prevention, compliance with the Policy, School procedures, training etc. will be carried out to establish areas where improvements could be made, and to review and, where necessary, revise the School's Health and Safety Policy.

The Health and Safety (Consultation with Employees) Regulations 1996

The SMT of Tower College will consult with employees and give consideration to their views before any decisions are taken with regard to new work methods or equipment which may affect their health and safety. This will be discharged by the Site Manager.

The SMT will, in good time:

- provide adequate information on what is proposed
- give those affected sufficient time to express their views, and
- listen and take account of the response.

Part 3

ARRANGEMENTS FOR HEALTH, SAFETY AND WELFARE

**Dictates stand alone arrangements with stand alone policies in place*

3.1 Accident Reporting, Recording and Investigation

Under the direction of Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) (2013) certain types of accident must be reported to the HSE. The employer must keep a record of any reportable injury, disease or dangerous occurrence. This must include:

- date
- time
- personal details of person affected
- location of accident
- nature of event
- treatment required

Reporting

The HSE must be notified of fatal and major injuries and dangerous occurrences without delay (via the HSE website or by telephone). This notification must be followed up within 10 days with a written report on Form 2508. The School Principal will complete and post the forms on the HSE website. This information will be shared with the Vice-Principal, Bursar and Site-Manager.

The following incidents must be reported on the School's report forms. These should be completed by the member of staff responsible at the time the injury occurs, for example during a lesson/trip/sports match. It is not the responsibility of the office to fill out accident report forms. The office will process the medical information, not the details of what happened or how/when.

The following must be recorded:

- an accident that is the result of any School activity (including any involving contractors)
- an accident that occurs because of the way in which a School activity has been organised or managed
- an accident that is the result of the use of equipment, machinery or substances
- an accident that occurs because of the design or condition of the premises
- an accident that requires first aid where personal injury has been sustained
- any assault that requires first aid treatment
- any casualty that is referred to hospital or their local GP

All sections of the Personal Injury Form (on staff website) **must** be completed and this will be made available to the Principal, Bursar and Site Manager. There can never be enough information on the forms.

All accidents, no matter how small, must be recorded and documented. If in doubt staff should assume that they must write it down and report it. This also applies to near miss events that must be monitored as part of the School's health and safety management system.

Near Miss Reporting/Incidents

Staff should report near miss incidents to the Site Manager / Bursar (via email or verbally). These will be recorded and monitored as a proactive measure to prevent accidents occurring. All accidents and near miss occurrences will be reported to the Governing Body through written reports. The SMT will be informed of serious issues as soon as possible after the incident by the Site Manager. Incidents including damage to property or School vehicles must also be reported.

Accident Investigation

Investigating accidents is a requirement if a F2058 has been completed, but all accidents, irrespective of severity, should be investigated to prevent further occurrence. Minor accidents should be investigated by the Head of Department and the outcomes shared with the HSC (Health and Safety Committee). HSE reportable accidents will be investigated by the Site Manager with the assistance of the Head of Department and other staff as required.

3.2 Bullying and Harassment*

Tower College holds a standalone procedure for bullying and harassment, copies of which can be accessed from the staff website or Basecamp.

3.3 Safeguarding and Child Protection*

Tower College holds a stand-alone Safeguarding Policy, copies of which can be accessed from the staff website or Basecamp.

3.4 Contractors (Management Of) *

The Site Manager and Bursar are responsible for the management of contractors on site. All contractors undertaking work on the School site must abide by the School's health and safety rules.

The management of contractors on site is outlined in the Safety Management Systems and Guidance Notes for Contractors. This document must be sent out to all contractors as a **pre-contract** document. Any additional managers outside of the Site Manager who have issued tenders for hiring any contractor, or an external tradesman where work is to be carried out on site, must also follow this guidance.

3.5 Contractors (Management of Asbestos)*

The School has produced an Asbestos Risk Assessment from a third-party company which contains an Asbestos Register. These documents outline how the School will manage asbestos on site. Copies are available from the Site Manager and staff website. An electronic version is also uploaded to the main school website site. This allows any external contractors to have access to the document along with all asbestos related surveys which the School has previously undertaken.

All contractors must be made aware of the Asbestos Register and the Asbestos Management Plan **before** they start any invasive work to the fabric of the building, or in underground pipe work. This is the responsibility of the member of staff inducting or issuing the tenders for hiring the contractor.

If the presence of asbestos is suspected at any time then the School's Asbestos Policy must be followed, and the relevant testing undertaken. No work should be started or continue in the area until the results are shared, and further action is agreed in accordance with the School's policy.

3.6 Contractors and Visitors on Site

On arrival on site, visitors should park in the designated visitors' car park in front of school or on the main school car park.

All visitors should report to Reception, where they will be asked to sign in and be allocated a visitor's badge. The badge should remain on show for the duration of their stay. The reception staff should be informed in advance of expected visitor(s). Once the visitor(s) have signed in, the reception staff will contact the relevant member of staff to come and collect the visitor(s). This will prevent visitors wandering around on site without a member of staff and assist the School with good safeguarding practice. Visitor badges must be collected from the visitors upon departure and destroyed. If the visitor has been issued with a visitor card (eg supply teacher) to enable easier access, this absolutely must be collected before the visitor leaves.

Visitors must be reminded of the above arrangements by the relevant member of staff when arranging appointments.

Hosting staff should inform visitors of any health and safety issues, including the relevant welfare facilities for use on site, and draw their attention to the fire evacuation procedures (laminated evacuation notices around the site, the back of the visitor's badge, or the visitors' leaflet at reception).

The control of contractor's document must be followed by all Staff commissioning contractors/tradesmen on site.

The site is quite open and the School buildings (including the grounds/ sports facilities) can be accessed by parents. An assessment of this risk will be undertaken to ensure controls are in place to prevent unwanted access.

3.7 Control of Substances Hazardous to Health (COSHH) – including compressed gases and radiation*

The Control of Substances Hazardous to Health (COSHH) Regulations 2002 (as amended) impose statutory duties upon employers and employees. To enable those statutory duties to be carried out, Tower College is committed, so far as is

reasonably practicable, to safeguard the health of its employees and other persons who may be exposed through their work with substances hazardous to health.

Tower College holds a stand-alone COSHH policy which outlines the regulatory requirements in full detail and is available on the staff website.

Radiation

The School's Science Department Policy must outline the procedures and responsible persons for radioactive substances held on site.

The School recognises that some individuals may experience symptoms that they believe are related to electromagnetic hypersensitivity, a functional disability that they feel is brought about by exposure to the non-ionising radiation associated with sources including wi-fi. Tower College will make any reasonable adjustment to mitigate the impact of wi-fi on anyone who believes that he/she is affected by the condition. The World Health Organisation (WHO) recognises the condition but neither the WHO nor the UK Department of Health accepts that there is any link to wi-fi transmissions. As long as this is the stance taken by such organisations, the School intends to roll-out wi-fi to meet agreed business needs whilst taking every step to mitigate the effects on staff who may suffer adversely from the effects of wi-fi.

Highly Flammable Liquids (HFL)

A HFL is any liquid, liquid solution, emulsion or suspension which, when tested in the manner specified in the Regulations, gives off a flammable vapour at a temperature less than 32°C and also supports combustion. The Fire Procedures and Policy outlines the strict requirements for the use and storage of HFL on site.

3.8 Defect Reporting Procedures

All defective equipment must be taken out of use. Defects should be logged via TCSupport which will then be acted upon by the maintenance team. Urgent issues should be reported by telephone to the Site Manager (or the emergency call out) for action.

Staff should not attempt to repair or undertake maintenance tasks, unless instructed by the Maintenance Supervisor, or the task is outlined in their job description.

3.9 Display Screen Equipment (DSE)

The Health and Safety (Display Screen Equipment) (DSE) Regulations 1992 (amended 2002) apply to any employee habitually (for periods longer than half the working day) using any type of display screen equipment for a significant part of the normal week. This includes work done outside the office, including work undertaken at home. DSE assessments of the workstation must be undertaken and this should form part of new staff induction if the member of staff is office based.

It is the School's intention to optimise the use and application of DSE within the organisation, whilst safeguarding the health, welfare and job satisfaction of those involved in operating such equipment.

When new display screen equipment is being selected, due consideration will be given to the health and safety aspects of its design. Before commencing work, DSE operators must adjust the workplace to suit their own needs as follows:

- adjust the height and position of the chair
- ensure that lighting is adequate and appropriate, whilst using curtains or blinds to avoid screen reflections
- ensure that the display screen is clean and adjust brightness and sharpness of image as necessary
- position all equipment, such as keyboards, to avoid awkward posture or movements. Particular care should be taken to avoid repeated stretching movements.

Employees should consult their Line Manager for advice concerning any problems which may arise with the use of DSE.

Working with Laptop Computers

Laptops should be compact and easy to carry. However, this results in design compromises, such as smaller keyboards and screens. This can make working positions less comfortable than a normal display screen in prolonged use.

Using a portable computer should be avoided when full-sized equipment is available. However, when using a laptop:

- the user should sit comfortably
- the screen should be angled so it can be seen clearly with minimal reflections
- the user should take frequent breaks if work is prolonged
- the laptop should be placed on a firm surface at the right height for keying

Eye and Eyesight Testing

Under the Display Screen Equipment (DSE) Regulations, those employees classed as habitual users (over four hours per day) are entitled to request an eye test once a written DSE assessment has taken place. Such eye tests only need to be provided by the employer at approximately two yearly intervals, or as otherwise determined by the optician.

Where an employee wishes to undertake an eye test and proposes to seek reimbursement from the School, the tests must *be specifically for DSE users* and must be arranged with the knowledge of the School's Bursar. A form should be completed and taken to the optician. The optician will then provide the relevant information required by the School to process any expenses claim. The employee should then return the form to the School's Bursar.

Visual discomfort

Where an employee experiences visual difficulties and has reason to believe that these may be caused by work with DSE, the School will offer an eye and eyesight test after the DSE assessment has been updated.

Costs of testing

The full cost of the eye test will be met by the School provided that the test has been agreed by the Bursar and the relevant form is completed *prior* to the appointment. Where an employee has arranged a test independently and without the knowledge of the School, even if the test is specifically related to display screen use, the School shall not be responsible for the costs incurred.

Supply of glasses

Where glasses or replacement lenses are found to be necessary, *specifically for the use of DSE*, the School will contribute up to £70 towards the cost, on the production of appropriate receipt documentation. The School will not contribute towards the cost of bifocal or varifocal lenses. Request for funds must be made before going for an eye test.

Care and replacement of glasses and/or frames

Employees are personally responsible for the safekeeping of glasses and/or frames and are expected to show the same degree of care as for any other item of School property. Where a change in an employee's vision is found and a different prescription is required, the School will bear the cost of replacement (subject to the maximum amount shown above) providing the procedures outlined above have been followed.

3.10 Electricity at Work

The Electricity at Work Regulations 1989 require that precautions are taken to reduce the risk of death and injury from electricity in the workplace. Risk assessments for the use of electrical equipment must be carried out by the relevant department. Specific details and guidance for high risk activities should be outlined in the relevant Department Policy for example maintenance work on live electricity.

For general electrical equipment used by staff:

- All electrical systems should be constructed and maintained so as to prevent danger. No staff should work on electrical systems without being competent and qualified to the relevant standards (17th Edition due to be 18th Edition from 01 July 2018).
- All portable electrical equipment on site must be subject to regular testing. This equipment should display identification of inspection.
- There must be suitable means of isolating or cutting the electricity supply off to any item of equipment.
- Double/triple adaptor plugs *must not* be used as they contribute to fire hazards.
- Drum extension cables must be fully unwound when in use. This should not create a trip hazard in the area of use.
- Extension cables should not feed additional extension cables (daisy chains).

- Staff should visually check the equipment before use. If any issues are found, the equipment should be turned off, isolated from the power supply and the defect reported to the Site Manager via [FreshDesk](#).
- Any electrical equipment created by pupils (as part of a design project or as part of a performance) must be checked by a competent electrician before it is used. It is the responsibility of the member of staff in charge of the project to ensure that this takes place.
- All electrical equipment that is not in use should be unplugged/ turned off. This is particularly important overnight and during holiday periods.

Guidance for the use of electrical equipment by specific departmental staff and contractors on site must be outlined in the contractors' company's policy and risk assessments.

3.11 Fire Precautions and Emergency Plans*

It is essential that all employees familiarise themselves fully, not only with the established escape route from their own areas, but also with the routes from other areas. Evacuation signage is displayed in all departments outlining the School's evacuation points. The School has a Fire Procedures and Policy in place. This outline action to be taken in an emergency and names the School's designated Fire Wardens and their specific areas of duty. This document, along with the School Contingency Plan, outlines in more detail the fire and evacuation procedures. Copies will be available on the staff website and hard copies of the Contingency Plan have been disseminated to the SMT.

3.12 First Aid and Medication*

In line with the Health and Safety (First Aid) Regulations 1981 (amended 2015) the School has undertaken a first aid risk assessment. This document outlines the requirement for first aid provision on the School site.

Employees must make themselves aware of who the department first aider is, or how to contact a first aider in the area. The appointed people will monitor and replenish the first aid box located in their area.

Further guidance is contained in the Tower College First Aid policy; this also includes accident reporting procedures. Copies of the policy are available from the First Aid Officer and the staff website.

Drugs and Alcohol

Alcohol or drug abuse by employees and sub-contractors (including supervisory and management staff) can adversely affect the health and safety of themselves and/or others on the site. Therefore, it is the policy of the School that any person known to be, or strongly suspected of being, affected by alcohol or drugs must be referred to the appropriate Manager who must arrange for that person to be removed from site. The staff handbook outlines the School's Drugs and Alcohol policies.

3.13 Housekeeping, Cleaning & Waste Disposal

Housekeeping operations take place throughout the site on a daily basis. These are organised and controlled by the Site Manager. Staff are responsible for keeping their own workspace/departments tidy, and are required to undertake the regular removal of day to day waste and unwanted items into bins so that the Housekeeping staff can remove it.

Good housekeeping is a major control measure in the prevention and reduction of fire and slip, trip and fall hazards.

Staff should not bring cleaning products in from home to use in the School to clean their work areas. Products are controlled and available from the Head of Support Services on request.

Waste is collected in the site's industrial bins or the School compactors which are removed from site by an external contractor. If staff have large items for removal, assistance should be sought from the Maintenance Department if a skip is required.

Clinical waste is removed from site by external contractors (Cathedral Hygiene) this also includes 'sharps' used by the Medical Centre. All clinical waste must be disposed of through a registered Contractor; used first aid items which have been contaminated by body fluids must be placed in yellow hazard bags (available in first aid boxes and in the hazard care bags held by the First Aid Officer) and taken to the Medical Room for disposal.

3.14 Lettings/Shared Use of Premises

The commercial events which take place at the School are organised by the SMT. Procedures and documentation for each event will be created by the Venue Manager and shared with the relevant departments and staff as required. Meetings will be held with key staff before large events to ensure that procedures are in place, in order to fulfil the School's duty of care to staff, pupils and members of the public. This must include producing risk assessments.

3.15 Lifting Equipment (including lifts, hoists and evacuation chairs)

Under the Lifting Operations and Lifting Equipment Regulations 1998 (LOLER) the School must have safe systems of work and/or risk assessments in place for the use of lifting equipment. In the departments where lifting equipment is used, information will be available in the department policy. Staff must be aware of the control measures required, and undertake the tasks following the safe working methods.

Lifting equipment that does not have the appropriate certification must not be used for lifting personnel, for example tractor buckets or trailers.

All lifting equipment must be maintained in accordance with the manufacturer's instructions. Equipment such as lifts and hoists must be tested every six months by a qualified, competent person. Records of the maintenance will be retained on site by the relevant department, or the School's Site Manager.

3.16 Lone Working and Personal Safety

Lone working on site should be the exception, rather than the rule, particularly with high risk activities such as confined space work, and working at height. Due to the layout of the site and the buildings, at times staff may find themselves working in remote areas. Communication with others at this time is paramount. Staff must be involved with producing their own personal lone working risk assessments for the activities they are undertaking and be fully aware of the risks of lone working. This will ensure that all necessary control measures are in place and followed.

Staff must make their Line Manager aware of any lone working issues they encounter and produce a risk assessment in agreement with the Site Manager.

3.17 Maintenance/Inspection of Equipment including fume cupboards

Maintenance of all workplace equipment is required under the Provision and Use of Work Equipment Regulations 1998 (PUWER). Heads of Department must ensure that checks are carried out on the relevant equipment. This may be a visual check each time the equipment is used, or formal inspections at designated time periods by qualified competent persons. This will be arranged through the Maintenance Department or agreed by the Head of Department who is responsible for the area. Communication between the Head of Department and the Maintenance Department must be made to ensure that there is no confusion as to responsibility and that service/maintenance is not missed.

Where equipment is formally inspected records must be held for a period of five years by the relevant person as above.

3.18 Manual Handling*

The Manual Handling Operations Regulations 1992, as amended in 2002, apply to a wide range of manual handling activities such as pushing, pulling, lifting, lowering and carrying. Loads in the workplace may be inanimate such as a box, trolley, or animate such as a person or animal. The School has a duty under the Regulations to avoid, assess, and reduce these activities.

Departmental risk assessments must be in place for manual handling activities and staff must be appropriately trained to undertake the tasks required of them.

Further information can be found in the School's stand-alone Manual Handling Risk Procedures available from the Health, Safety and Compliance Manager or on the Policy page of the VLE page.

3.19 Minibuses and School Vehicles*

Tower College's Minibus and Vehicles Policy is available on the staff website and held in the minibus folders. All drivers of school vehicles must read this document before taking a vehicle off site. Staff driving the School minibuses must have registered on the School's system for fleet management. (Also see section 3.30)

3.20 Monitoring Arrangements

Under the Management of Health and Safety at Work Regulations 1999 the School will monitor the health and safety management structure and performance. To help this process, the Governors and Principal will, through designated staff, ensure that all reasonable inspection facilities and information are provided on request to officers of the Health and Safety Executive (HSE), Trade Union health and safety representatives and any other external inspectorate bodies.

Departmental audits will be undertaken by the Site Manager, with the assistance of the Heads of Department and other designated staff. All actions and outcomes will be discussed with the Principal, Vice-Principal and Bursar. This information will be made available to the Governors through the Health and Safety Committee, or on request.

Periodical 'snap' checks will be undertaken by the Principal to identify the current position of the School and to raise awareness if further action needs to be taken.

The School's Health and Safety Management structure will be based on current guidelines such as British Standards OHSAS 18001:2007.

3.21 Noise at Work

The Noise at Work Regulations 2005 put the employer under a general duty to reduce the risk of hearing damage to the lowest level reasonably practicable.

Lower Exposure action: Daily or weekly exposure **of 80dB(A)**

Upper Exposure action: Daily or weekly exposure **of 85dB(A)**

The Risk of Damage to Hearing

Generally the sensitivity of hearing deteriorates with age. Loud noise can also induce hearing loss, the degree of which depends on a number of factors including:

- overall intensity of noise
- duration of exposure
- individual susceptibility

Normally the first sign of damage is a temporary dullness of hearing. This may be accompanied by a ringing in the ears, known as tinnitus. This normally passes after exposure ceases. However, if exposure is repeated before recovery is complete, some degree of permanent damage may set in. Sometimes peak pressure and sound waves from impact noise may be so great that there is a risk of instantaneous damage.

Noise Risk Assessments

Departmental risk assessments must be carried out where it is felt that noise is excessive. All such results must be made known to employees. Where exposure is at 85 dB or above, the issuing and wearing of ear protection is mandatory for **all** people including visitors in those areas. The School should look for active ways to manage down the noise levels. Staff will also be asked to attend Health Surveillance for hearing tests every two years while in employment at Tower College.

It should be noted that there is no cure for permanent hearing loss.

3.22 Off Site and Educational Visits

The School's legal 'Duty of Care' still operates when pupils are taken off site to partake in any activity such as field trips, day visits and sporting fixtures. Whilst pupils can derive a good deal of educational benefit from taking part in visits away from the School, particularly as they have the opportunity to undergo experiences not available in the classroom, it is essential that those leaders leading the activity demonstrate a high level of safety awareness, so that such visits take place without incident.

All off site activities must be risk assessed by the member of staff taking the trip. This follows the School's procedures which are outlined in the Educational Visits Policy available on the staff website. Generic risk assessments can be used by staff who are responsible and lead regular visits to the same place. However, one copy must be signed and dated at the start of the activity and reviewed annually if the same trip/activity continues to take place. Generic risk assessments should be added to if there are any changes during the course of the visit.

School trips must be organised and booked with the agreement of the Educational Visits Coordinator to ensure that all the requirements are in place before the activity commences. Trips from the School include those outside the United Kingdom, where stringent planning and arrangements must be in place. Staff undertaking off site activities must be aware of the School's Major Incident Procedure available on the staff website.

Arrangements will be in place to ensure that the Duke of Edinburgh (DofE) Award will undertake risk assessments and apply safe systems of work/lesson plans for the activities which they oversee. These will follow DofE guidance and recorded on their relevant recording system.

Staff should refer to the Schools Educational Visits Policy on the staff website visit.

3.23 Personal Protective Equipment (PPE)

The Personal Protective Equipment at Work Regulations 1992 state that every employer shall ensure that suitable personal protective equipment is provided to employees who may be exposed to a risk to their health or safety while at work, except where and to the extent that such a risk had been adequately controlled by other means which are equally or more effective.

When the departmental risk assessment and/or safe systems of work require personal protection, only clothing and equipment which affords the desired level of protection and requirements of the current British Standards is to be made available as a last resort of control. This may include:

- eye protection - goggles, face guards, shields (prescription safety glasses)
- protective footwear - boots or shoes with toe/sole full foot protection
- hand protection - gloves
- ear protection - ear plugs, ear defenders
- head protection - hard hats, bump caps, hair nets
- protective clothing - overalls, insulating clothing, high visibility clothes

This list is not exhaustive. Where PPE has been provided it should be looked after by the member of staff to whom it is issued and replaced in accordance with the manufacturer's guidance, when damaged or lost. The employee's responsibility is to ensure that the equipment supplied is not damaged or lost on purpose, and any defects or damage to the equipment is reported to the line manager immediately. PPE must be worn in the correct manner whilst on sites where this is indicated in the rules.

Information, Instruction and Training

Where PPE is provided to an employee, adequate information, instruction and training must be given to enable the employee to know the risk or risks which the PPE is designed to avoid or limit. The purpose for and the manner in which PPE is to be used should also be explained.

Pre use visual inspection must be undertaken by the operative before using PPE to ensure it is suitable and sufficient and it is not defective in any way.

3.24 Ponds, Lakes and Water Features

The School will work NWW Water to ensure that the water courses are not affected by any of the School's acts or omissions. The School will work closely with the above, as required for cleaning, maintenance and monitoring of the water courses.

Where the pond is used for educational or recreational purpose, the relevant departments will undertake suitable and sufficient risk assessments outlining the required control measures. The immediate hazards to pupils, staff and visitors from the water are drowning/death and illness due to pollution. Without staff supervision the lakes are out of bounds to pupils.

3.25 Risk Assessments*

Undertaking risk assessments is a requirement under the Management of Health and Safety at Work Regulations 1999. This requires the School to assess the risks to the health and safety of workers and any others who may be affected by the work carried out for the purpose of identifying measures needed to be taken to comply with other legislation. Carrying out these assessments will help to identify all the protective and preventive measures that must be taken to comply with the Regulations.

Copies of risk assessments should be in date and signed by the assessor and the responsible person(s) undertaking the tasks. These should be held in the area of work with copies held by the Health, Safety and Compliance Manager, allowing them to be available for inspection by the HSE, Governing Body and the outside inspectorates as required. They will also be internally audited by the Health and Safety Committee.

Risk assessments should be reviewed and revised:

- Annually or sooner if required.
- When there is reason to suspect the assessment is no longer valid. This may become apparent through accidents, safety complaints, ill-health trends, or the employer may become aware that a relevant piece of legislation has fallen out of date.
- When there has been a significant change in the matters to which the assessment relates (such as the introduction of new work equipment, changes in management personnel, new markets or applications for the School's products, cutbacks in training etc.

All significant findings should be recorded and brought to the attention of relevant personnel, with signatures provided as evidence that the information has been read and received by those undertaking the tasks.

Specific risk assessments, which the School should have in place under current regulations are:

- Fire Risk Assessment
- Young workers employed by the School/work experience
- New and Expectant Mothers
- Control Of Substances Hazardous to Health
- Lone Working
- Asbestos Control
- Legionella Control

The School has created a guidance document for the completion of risk assessments available on the staff website.

3.26 Smoking on Site*

The School must adhere to the current Regulations which make up 'Smoke-free England'; there are five in all. In accordance with these Regulations, smoking is prohibited in School vehicles and in the vicinity of all hazardous storage. All buildings are designated no smoking areas.

Visitors, contractors and the public attending corporate events must be reminded of the School's no smoking policy by the relevant departments (during induction). Complying with the policy will ensure that the School and individuals abide by the law and, as outlined in the School's Fire Risk Assessments, considerably reduce the fire risk to the building/s.

The School's 'No Smoking Policy' is available on the policy page of the staff website.

3.27 Training and Development related to Health and Safety

Section 2 of the Health and Safety at Work Act 1974 imposes a general duty on the School to provide as much information, instruction, training and supervision as is necessary to ensure, so far as is reasonably practicable, the health and safety at work of the employees

- as part of their induction training
- on being exposed to new or increased risks because they are being transferred or given a change of responsibility
- on the introduction of new work equipment or work procedure
- on the introduction of new technology

The current qualifications must be reviewed to ensure that the employee is still qualified (e.g. First Aid) as outlined by the certificating body.

Induction Procedure

An induction procedure should be carried out by the new employee's line manager, or the Vice-Principal on the new employee's first day(s) of work. The School will use a health and safety induction form to record the process relating to H&S tasks. Other aspects of the new employee's work should be shown to him/her, including any departmental policies, rest areas and other welfare facilities.

Specific Training

No employee will carry out tasks for which he/she has not received adequate training. He/she must also be deemed 'competent' to undertake the task. In particular, training must cover asbestos awareness, manual handling, the operation of dangerous machinery, mechanical or electrical maintenance of equipment or machinery, and department/health and safety policies and risk assessments that are in place.

Refresher Training

An employee's competence will decline if skills are not used regularly. Training, therefore, needs to be repeated periodically to ensure continued competence. Information from personal performance monitoring, health and safety checks, accident investigations and near-miss incidents can help establish a suitable period for re-training. Specific qualifications such as first aid and fire marshal training require that refresher training is delivered at regular time intervals.

All refresher training must be recorded and a record kept on file by the Vice-Principal only retains records of training delivered through H&S Department).

3.28 Vehicle Movement on Site*

Due to the layout of the site, vehicles will travel from one location to the other during the course of the School's daily business. This will include staff working in School owned vehicles (vans, lorries, minibuses etc) and their own private cars.

Staff using cars on site should observe current speed and parking restrictions, and drive and park with consideration for others while on site. Contractors will also be using a wide range of vehicles ranging from vans, trucks, cranes and diggers from time to time; these must all be covered in the contractor's risk assessment regarding their movement on site.

Driving

All employees are required to have a full UK driving licence (for over one year and two years for mini bus driving) in order to drive any School or hire vehicle, or their own vehicle on behalf of the School, to be covered under the School's motor insurance policy. All staff must have registered to drive following the School's requirement to obtain their driving details and be on the database system held by the Site Manager. The School is currently using an external regulated body (Licence Bureau) to retain this information. As a requirement for the School's motor insurance, this information may need to be shared with them if requested.

Employees *must* observe and obey all current traffic laws, speed restrictions etc including the use of seat belts while driving on School business. If they drive Tower College vehicles they must also follow their departmental risk assessments for doing so.

Accidents

It is mandatory for any drivers involved in an accident while driving as part of their job role to report the accident to the Principal. If the accident occurs on a road, the driver must immediately stop and report any damage caused to property (including other vehicles or property on or immediately adjacent to the road) or to certain animals (including dogs, horses and sheep but not cats) or to persons (passengers, pedestrians, other drivers), to any person having reasonable grounds for requiring the information. If this cannot be done, then the police must be informed as soon as possible and, in any case, within 24 hours.

Failure to stop or report an accident to the police which occurs on a public highway is a criminal offence. The incident/accident and injuries must be reported following the School's Accident Reporting procedures.

Minibuses

The School has not only a moral but also a legal responsibility to ensure that all School minibuses provide a safe method and quality of transportation. Passengers are entitled to assume that the vehicle in which they are travelling is fit for that purpose, so therefore the operator (i.e. the School) and the driver (assumed to be always a member of Tower College staff) ultimately has the duty of providing a safe vehicle, driven safely. Current road laws will apply to the vehicle and driver whilst driven on the public highways.

The School has a policy for the use of minibuses which is available on the staff website. Staff using a School minibus are required to read this policy. It is the responsibility of Heads of Department to ensure that the relevant staff have done so.

3.29 Water Hygiene – Control of Legionella*

Under the Health & Safety at Work Act (1974) and the Control of Substances Hazardous to Health Regulations (2002) the School has a duty to consider risk from legionella bacteria which may affect staff, pupils and members of the public on site, through the hot/cold water services and systems. This requires them to take suitable and sufficient precautions.

The School's Site Manager is the current Legionella duty holder.

The School has created a Legionella Policy which outlines the control in detail and this is available on the staff website.

3.30 Welfare Facilities

The School has a duty under the Workplace (Health, Safety and Welfare) Regulations 1992 to provide, as far as it is reasonably practicable, welfare facilities to all staff, including those with disabilities.

Offices

Office cleaning will be undertaken on a regular daily basis for weekdays. Suitable artificial lighting is to be provided and maintained in all offices, passageways and stairways. Trailing electrical leads etc. should be positioned so as to not create a potential trip hazard. All fire exits and fire fighting appliances should be kept free from obstruction. Step ladders/kick stools or steps should be provided to access items at a higher level.

Ventilation

The School will have effective and suitable provision to ensure that every enclosed work space is ventilated by a

sufficient quantity of fresh or purified air. Air which is hot and humid due to the processes or equipment in the workplace is to be replaced at a reasonable rate. Any mechanical ventilation systems (including air conditioning) should be regularly and properly cleaned and tested to ensure that they are kept free from anything which may contaminate the air. This will be carried out by the Maintenance Department.

Temperature

During working hours, the temperature in all working places should be reasonable without the need for special clothing. Where it is impractical due to hot or cold processes, the School will take all reasonable steps to achieve a temperature which is as close as possible to comfortable using local heating or cooling or suitable clothing.

Reasonable account should be taken with regard to the outside temperature and the type of work being carried out. Thermometers can be provided to enable persons at work to measure temperatures throughout the workplace, on request.

Lighting

Lighting will be sufficient to enable every employee to work and move from place to place safely and without experiencing eye-strain. Stairs should be well lit. Windows and skylights should be cleaned at regular intervals and kept free from obstruction to allow maximum daylight. External lighting on site must be dealt with sympathetically due to the location and nature of the site, however, it is important that areas are well lit to carry out tasks, and to allow safe passage around the site both for pedestrians and vehicles. This will be monitored via audits undertaken at various times of the year. Results of the audits will be discussed with the Site Manager for possible improvement or change.

Cleanliness and Waste Materials

Every work place and the fittings therein shall be kept sufficiently clean. Cleaning should be carried out by an effective and suitable method and without creating or exposing anyone to a health and safety risk. Cleaning methods must not expose anyone to substantial amounts of dust or to health or safety risks arising from the use of cleaning agents. So far as is reasonably practicable, waste materials shall not be allowed to accumulate in a work place except in suitable receptacles.

Waste of a controlled nature shall be removed or destroyed in accordance with the Duty of Care - Waste Management in line with the Environmental Protection Act 1990.

Room Dimensions and Workstations

Rooms should have enough free space to allow people to get to and from workstations and to move within a room with ease. Any obstructions should be clearly marked and visible to those using the area. Workstations must be arranged to enable each task to be carried out safely and comfortably. All frequently used equipment and materials should be in easy reach without undue bending or stretching.

Floors and Traffic Routes

Floors should be of sound construction and should have adequate strength and stability. Where there are pot holes or dips, adequate precautions should be taken to prevent accidents. Due to the age and nature of the School building, areas may have uneven surfaces, pot holes etc, and staff must be aware of this as they travel around the School site. Staff are advised to wear sensible shoes at all times.

Where a leak or spillage occurs and it is likely to represent a slipping hazard, immediate steps must be taken to fence it off and mop it up or cover it with absorbent granules. Floors and traffic routes should be kept free from obstructions which may present a hazard and impede access. Every work place shall be organised in such a way that pedestrians and vehicles can circulate in a safe manner.

Where large vehicles have to reverse, measures for reducing risks to pedestrians must be considered and whatever measures are adopted, a safe system of work should operate at all times. This should be outlined in the relevant department risk assessments.

Stairs

All stairs should be well lit, free from any obstruction and have handrails where possible (although due to the age and nature of the site, this is not always possible). They should be well maintained and kept clean and free of anything which may cause slips, trips and falls. Due to the nature and the age of some areas of the buildings, stairs may suffer damage and be in a poor condition due to their age. This will be monitored and assessed on a regular basis by the responsible person in the area and the Site Manager. A full step and stairs survey of the site has been undertaken and this will form part of the monitoring process. Defects will be reported to the Maintenance Team via TCSupport.

Sanitary Conveniences and Washing Stations

The School shall provide suitable and sufficient sanitary conveniences at accessible places for both adult men and women (separate from pupils). Toilets, urinals and the rooms containing them are to be kept in a clean and orderly condition. Suitable washing facilities should be provided in the vicinity of the conveniences and must include a supply of hot and cold or warm running water, soap and drying facilities. Staff are required, as part of the School's Safeguarding Procedures to use, where possible, the adult facilities.

Drinking Water

An adequate supply of clean drinking water shall be provided for all persons in the workplace and be readily accessible at suitable places. There shall also be a sufficient number of suitable cups or other drinking vessels unless the supply of drinking water is in a jet form which persons can easily drink from. Safe drinking water signage will be in place above every tap on site to comply with requirements from the Independent Schools Inspectorate.

Changing and Clothing Facilities

Suitable and sufficient facilities shall be provided for any person in the work place to change clothing in all cases where:

- the person has to wear special clothing for the purpose of work
- the person cannot, for reasons of health or propriety, be expected to change in another room

Rest Rooms

Rest areas and rest rooms are to be clean to enable employees to use them without experiencing discomfort whilst sitting or eating. The staff room and the dining hall are all areas available for staff to use at the required times.

3.31 Work Experience Pupils

Specific legislative requirements concerning the Protection of Young Persons were contained in the Health and Safety (Young Persons) Regulations 1997. These Regulations were incorporated into the Management of Health and Safety at Work Regulations 1999. The implications for the School are still the same. A 'young person' is defined as being someone who has not attained the age of 18, and a child as being someone who is not over compulsory school age. This legislation applies to the employment of all young people, regardless of the number of hours worked or the duration of the period of work, including those on any relevant training schemes. It is also the School's Duty of Care to undertake risk assessments for young persons on work placements or who are working at the School during the holiday periods. Managers who take on young persons for the above must have risk assessments and induction documents in place before he/she undertakes his/her chosen job role.

Specific Risk Assessments

The employer must make a risk assessment specifically related to the young person before employing him/her, and it should consider:

- the immaturity and inexperience of the young person and any consequential lack of awareness of risks
- the health and safety training to be given
- the extent of exposure to any chemical, biological or physical agents
- the nature and layout of the work area
- the types of equipment, methods of use and work activities to be undertaken
- the employment of young and vulnerable persons

3.32 Working at Height

The Work at Height Regulations 2005 came into force on 6 April 2005. The Regulations apply to all working at height where there is a risk of a fall liable to cause personal injury. They place duties on employers, the self-employed, and any person who controls the work of others (for example Heads of Department who may contract others to work at height).

The Work at Height (Amendment) Regulations 2007 which came into force on 6 April 2007 apply to those who work at height or who provide instruction or leadership to one or more people engaged in caving or climbing by way of sport, recreation, team building or similar activities in Great Britain. This will apply to the use of the assault course by the CCF and also by the Stowe Enterprises team who may hire out the area to members of the public.

As part of the Regulations, duty holders must ensure that:

- all work at height is properly planned and organised;
- those involved in work at height are competent to conduct the activity ;
- the risks from work at height are assessed and appropriate work equipment is selected and used;
- the risks from fragile surfaces are properly controlled; and
- equipment for work at height is properly inspected and maintained, with the relevant departments holding the records of the inspections

There is a simple hierarchy for managing and selecting equipment for work at height. Employers must:

- avoid work at height where they can;
- use work equipment or other measures to prevent falls where they cannot avoid working at height; and where they cannot eliminate the risk of a fall, use work equipment or other measures to minimise the distance and consequences of a fall should one occur.

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

Where scaffolding and tower scaffolds are used they must be erected by a competent person. Scaffolding must display a safety tag to confirm that it has been checked and is safe to use. Ladders and steps must never be used on scaffolding, this must be outlined in the risk assessment.

When it is required to work on the roof of a building, whether for planned maintenance or for emergency repair, written risk assessments must be in place outlining the required control measures for that task. Where possible, no persons should work on the roof alone. Generic risk assessments for working on a roof must be checked and updated to ensure that they are relevant for the specific task. Emergency repairs can present different risks to those noted in generic risk assessments, therefore a specific assessment is required as the generic assessment may not record the additional control measures that are required.

ADDITIONAL POLICIES

Some of the arrangements in earlier sections refer to subject policies*. The School has created and adopted separate policies for the following subjects. These policies give further information and guidance and contain more depth and detail of the specific practices and procedures that must be followed. Managers are responsible for ensuring that staff have access to these documents, and that they have made themselves aware of the contents relating to their work practice.

- Anti-Bullying
- Asbestos (including Asbestos Register and Asbestos Management Plan)
- Kitchen Policy (Holroyde Howe)
- Control of Substances Hazardous to Health (COSHH)
- Contingency Planning
- Equality Policy
- First Aid
- Fire Procedures and Policy
- Food Allergy Policy
- Manual Handling
- Risk Assessment
- Safety Management System and Guidance Notes for Contractors
- Smoking Policy
- Tower College Security Policy
- Tower College Minibus
- Vehicles on Site
- Water Hygiene & Legionella
- Workplace Equipment

These can be accessed via the staff website. These policies are all subject to annual review and change. Staff will be informed via email and newsletter of any changes that have been made.