

DOCUMENT CONTROL	
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1.0 Introduction

1.1 The primary role of this document is to outline the day to day health & safety of students, staff and includes the key responsibilities and standards for staff.

1.2 In order to achieve this, we must take into consideration local legal requirements and the specific characters of the school.

2.0 Our Vision

2.1 Our vision is to embed a positive culture of health & safety that is immediately tangible by the positive behaviours and attitudes of students and staff as well as the physical presentation of our school.

2.2 Once achieved, this vision will be evidenced by;

2.2.1 A feeling of equal responsibility for health & safety *'it's how we do things round here.'*

2.2.2 People are well trained, think, make good decisions and are held accountable for those decisions.

2.2.3 Recognising mistakes is part of being human and we primarily aim to learn from them.

2.2.4 Everyone can stop one another and have a positive health & safety conversation, ask questions and challenge practices and actions.

2.2.5 Health & Safety problems are resolved by staff in schools and best practices shared.

2.2.6 Visible objective evidence across the school of how we are doing.

2.2.6.1 High standards of behaviour

2.2.6.2 Quality of facilities and assets

2.2.6.3 Improving key performance indicators for each school;

2.2.6.3.1 To baseline and then consistently improve our Health & Safety audit scores

2.2.6.3.2 Quality near miss and incident data being used to make risk-based health & safety improvement decisions

2.2.6.3.3 baseline, benchmark and consistently reduce;

2.2.6.3.3.1 serious injuries to student and staff and lost work days suffered as a result of incidents

2.2.6.3.3.2 staff sickness absence

2.2.6.3.3.3 Insurance claims and continuous reduction in Employers and Public liability insurance premiums.

3.0 Our Approach

3.1 Health & Safety

3.1.1 Not only is keeping everyone safe the right thing to do, it creates a compelling case for Health & Safety to be at the very heart of our school.

3.1.2 Our Health & Safety policy and procedures build on our general code of conduct and underpin the pillar of achievement and ultimately the building of a strong coherent community.

3.1.3 We recognise that Health & Safety are issues that impact across all functions and operations. We also recognise that it has its own distinct technical competencies and management approaches.

For clarity of understanding;

3.1.3.1 Health includes the physical and mental health and wellbeing of students and staff. Management of medical conditions, exposure to harmful substances and agents (e.g. chemicals, noise, radiation) as well as prevention and management of stress.

3.1.3.2 Safety includes the physical protection from accidental harm from the physical environment to students and staff. Management of building construction and maintenance, fire, food, transport, trips and excursions, manual handling, accident reporting, first aid treatment as well as preventing slips, trips and falls etc.

3.2 Empower Everyone

3.2.1 We recognise that good health & safety and good leadership and behaviours are indistinguishable from each other. We firmly believe that the safest schools are also the most effective in terms of delivering outstanding teaching and learning, not only is keeping everyone safe which creates a compelling case for Health & Safety to be at the very heart of our school. Importantly any member of staff who is uncomfortable or unsure about their own or other's health & safety is empowered to *stop*, seek help, raise a concern or escalate issues.

3.3 Simplicity

3.3.1 We believe in the power of making things simple, avoiding bureaucracy and performing activity that adds no value or distracts us from real risks. This policy is supported by specific roles and responsibilities, school expectations and standards set out in our Health & Safety strategy and operating framework.

3.3.2 Our Health & Safety principles are designed to encourage engagement, underpin and guide everyone's thinking and action throughout the school.

3.4 Just / Fair Culture

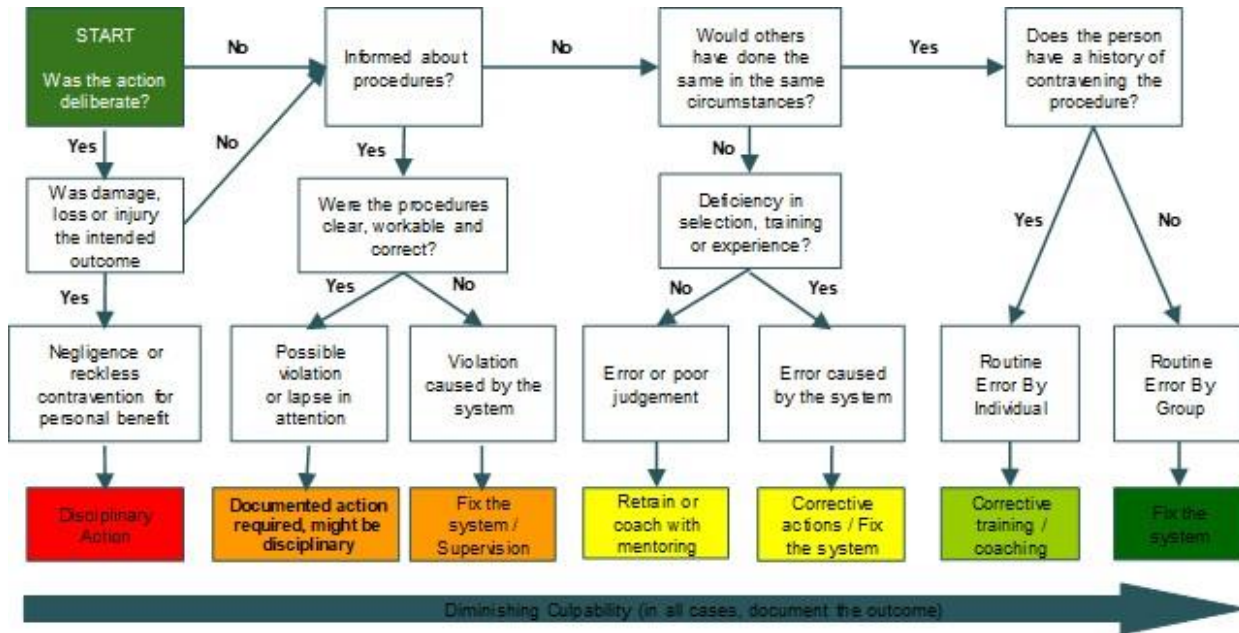
3.4.1 Our health & safety is based on decisions and actions taken that are consistent. We hold each other to account for the things that we can control and we accept that we are all human and are subject to momentary lapses, genuine mistakes and that the work environment can drive certain practices, violations and behaviours. We learn from these cases and use them as positive opportunities to improve.

Types of Human Error

- **Slips or lapses**, actions that were not as planned or were unintended. They occur during a familiar task (e.g. a slip, pressing the wrong button or a lapse forgetting to carry out a step in a procedure.)
- **Mistakes or errors of judgement** where the intended actions are wrong (e.g. we do the wrong thing believing it to be right.) These tend to occur where the person does not know the correct way because it is new, unexpected, or has not been trained.
- **Violations (shortcuts and work-a-rounds)** are intentional but usually well-meaning failures with very few being malicious. They often occur where the equipment or task has been poorly designed and/or maintained and the user is trying to be efficient. They may also occur as a result of change, when colleagues prefer to continue behaving and operating as they always have done, rather than adopt the new way.

3.4.2 Openness is an important aspect of the way we work and we want to learn about things before they go wrong as well as making sure they can't happen again when they do. Reporting of accidents, incidents, near misses and improvement ideas is encouraged and celebrated. Where we are made aware of something it is received in a blame freeway and acted upon.

3.4.3 Significant events, poor behaviours and breach of procedures/rule will all be investigated and our just/fair culture investigation model applied.



4.0 Policy Framework

4.1 This Health & Safety Policy Framework provides a common approach for health & safety management within the KGS.

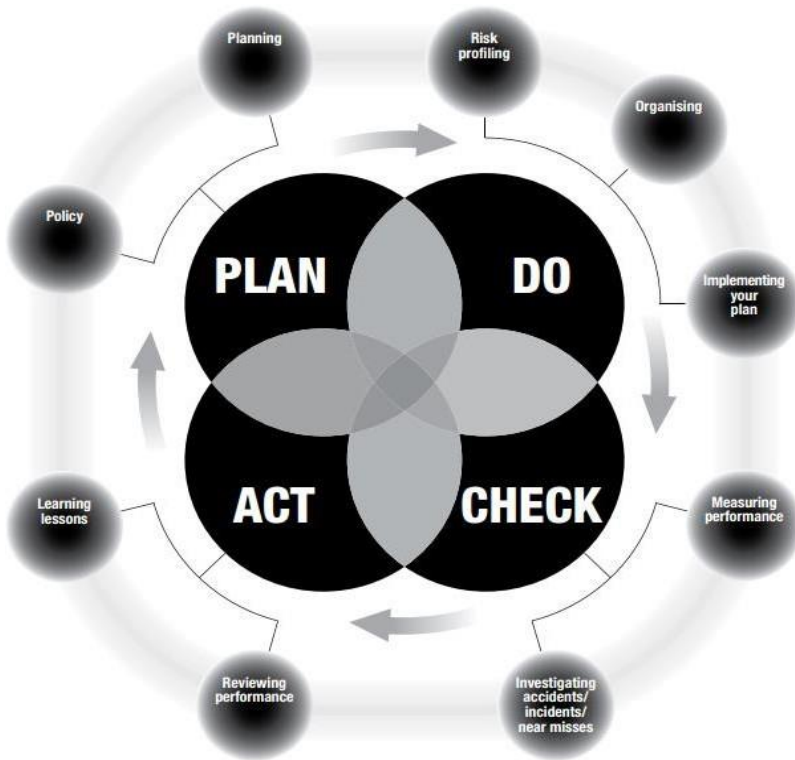
4.2 This policy framework and hence our management system is built around, ‘Managing for Health & Safety (HSG 65)’ published by the United Kingdom’s Health & Safety Executive.

4.3 The Management System will be reviewed regularly and updated to reflect lessons learned with the aim of driving continuous improvement in operational standards.

4.4 In general updates to this policy framework will be made towards the end of the final term of the academic year to allow for planning and implementation for the start of a new school year. Any update will be supported by communications explaining what has changed.

4.5 The Do, Check, Act approach to the management system is outlined below.

Plan, Do, Check, Act Model



5.0 Plan

5.1 Policy

5.1.1 The policy statement aims to provide a clear commitment from the organisation and an overview of expectations for all staff.

Health & Safety Policy Statement

5.1.2 Keeping everyone safe and well is the foundation on which the KGS is built and is something the Senior Leadership are accountable for.

5.1.3 We recognise that good health & safety and good leadership and behaviours are indistinguishable from each other. We firmly believe that the safest schools are also the most effective in terms of delivering outstanding teaching and learning, not only is keeping everyone safe it creates a compelling case for Health

& Safety to be at the very heart of our business. Importantly any member of staff who is uncomfortable or unsure about their own or other's health & safety is empowered to *stop*, seek help, raise a concern or escalate issues.

5.1.4 We believe in the power of making things simple, avoiding bureaucracy and performing activity that adds no value or distracts us from real risks. This policy is supported by and should be read in conjunction with specific roles and responsibilities, group expectations and standards set out in our Health & Safety Framework. However, by applying a few simple principles relentlessly as a group we can achieve extraordinary results.

5.1.5 Our Health & Safety principles are designed to encourage engagement, underpin and guide everyone's thinking and action throughout the school.

5.2 Planning

5.2.1 KGS will create and maintain an overall strategic Health & Safety plan. Owned by the Senior Management team and approved by the Board. The plan will be reviewed annually and update to consider;

- 5.2.1.1 Material changes to the school's risk profile
- 5.2.1.2 New legislative requirements or changes to recognised industry best practice
- 5.2.1.3 Lessons learnt from significant concerns, allegations, accidents, incidents or near misses
- 5.2.1.4 Progress against existing improvement plans
- 5.2.1.5 Overall health & safety performance

5.2.2 The strategic plan will be shared with the Executive Head and the School Senior Leadership team (SLT) in advance of the start of each academic year to allow for local consideration, coordination and planning.

5.2.3 The school will create an annual health & safety development plan, which will be owned by the Head of Operations and agreed by the Executive Head. The plan can be reviewed termly and update to consider;

- 5.2.3.1 Material changes in risk profile e.g. significant building or capital works, increases in student numbers and new risk.
- 5.2.3.2 Lesson learnt from concerns, accidents, incidents or near misses
- 5.2.3.3 Progress against existing the current plan
- 5.2.3.4 Overall health & safety performance

6.0 Do

6.1 Risk Profiling

KGS will create an overall risk profile of schools and use this profile to;

6.1.1 Prioritise and target resources and support

6.1.2 Create and maintain appropriate standards and requirements to address significant risk

6.1.3 Ensure adequate oversight and governance

The school will review its risk its principal risks and the suitability of controls annually

6.2 Organisation – Information & Communication

6.2.1 KGS recognises that active and effective two-way information flow, consultation and communication is essential for building a strong and proactive health & safety culture.

6.2.2 There are various formal and informal methods for providing information, consultation and communication throughout the managed system, delivered through the line management chain. A second independent chain exists for additional information, consultation and communication through regular contact points with the independent school functions including (Health & Safety, Safeguarding, Human Resources and Education.)

An overall summary of this is detailed in the table below;

Audience	Line Management Chain	Independent Functions
Senior Leadership Team	<ul style="list-style-type: none"> ● Senior Leadership Team Meetings ● Weekly reports ● Individual reviews & appraisals 	<ul style="list-style-type: none"> ● Senior Leadership Team Meetings ● Termly reports ● Specialist training, advice and support via courses, e-mail and calls ● Individual reviews & appraisals
Individual Senior Leadership Team	<ul style="list-style-type: none"> ● School Governors Meetings ● Senior Leadership Team meetings ● Health, Safety & Safeguarding Committee Meetings ● Individual reviews & appraisals ● Weekly & termly reports ● Inspections, monitoring & observations ● School visits 	<ul style="list-style-type: none"> ● School Governors Meetings ● Health, Safety & Safeguarding Committee Meetings ● HSS Audits ● School visits ● Specialist training, advice and support via courses, e-mail and calls ● Cross Group information

Teaching & Non-teaching staff	<ul style="list-style-type: none"> ● Inspections, monitoring & observations ● Team meetings ● Training days ● Individual reviews & appraisals ● HSS Committee minutes 	<ul style="list-style-type: none"> ● HSS Audits ● School visits ● Specialist training, advice & support via courses, e-mail and calls ● Termly Newsletter / Cross Group information
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6.3 Roles & Responsibilities

Delegation of authority, leading roles relating to general risk management and health & safety have been identified as having key responsibilities for the implementation of our health, safety and safeguarding policy and framework;

6.3.1 The KGS Board

The KGS Board will;

6.3.1.1 Encourage and assist the Executive Head and the Senior Leadership Team (SLT), in its drive towards achieving and maintaining leading levels of performance in health, safety and safeguarding.

6.3.1.2 Ensure through appropriate independent challenge and reviewing performance that effective leadership, colleague engagement and the provision of appropriate resources, systems, processes and tools are in place and the school employees, its customers, suppliers and its contractors enjoy a safe and healthy workplace.

6.3.1.3 Review with and support Executives in their effective management of health and safety, following the Plan, Do, Check, Act approach as detailed in Managing for Health & Safety. (HSG65)

6.3.2 The Executive Head

Along with the rest of senior management team, he is accountable to the KGS Board and will;

6.3.2.1 It is the responsibility of all staff to ensure the health & safety of all those affected by the organisation's operations in the day to day running of the schools.

6.3.2.2 Ensure the health, safety and safeguarding policy and framework is communicated, implemented, monitored, reviewed and updated as required.

6.3.2.3 Ensure an annual health, safety and safeguarding improvement plan is developed to achieve progress against agreed objectives and targets.

6.3.2.4 An annual report on the health, safety and safeguarding performance of the organisation is presented to the KGS Board.

6.3.2.5 Ensure suitable and sufficient funds, people, materials and equipment are provided to meet health, safety safeguarding requirements.

6.3.2.6 Senior management designated with health, safety and safeguarding responsibilities are provided with support to enable relevant objectives and targets to be met.

6.3.2.7 Lead by example and ensure a positive and proactive health, safety and safeguarding culture is promoted throughout the organization.

6.3.3 *School Board and or Governors*

The KGS Board of Directors and or the Board of Governors has a strategic role in the running of the school, including the management of health safety and safeguarding and will ensure:

6.3.3.1 local policy and procedures are created, developed, monitored and updated and incorporate both the requirements of the KGS Health, Safety & Safeguarding Policy and Framework and any relevant national health, safety and safeguarding legislative requirements required by any national, regional, state or city regulatory or enforcing authority.

6.3.3.2 A health, safety and safeguarding committee meets at least termly and reports on relevant performance issues, planned improvements issues and any findings from any internal or external inspection, audit or regulatory visit.

6.3.3.3 ensure suitable and sufficient funds, people, materials and equipment are provided to meet health, safety safeguarding requirements.

6.3.3.4 school principals/headteachers and other senior management designated with health, safety and safeguarding responsibilities are provided with support to enable relevant objectives and targets to be met.

6.3.3.5 Lead by example and ensure a positive and proactive health, safety and safeguarding culture is promoted throughout the organisation.

6.3.4 *Executive Head/Heads of Schools and Head of Operations*

The Executive Head is responsible for all aspect of day-to-day operations in their school but in reflecting the local organisational structure of the school but may delegate some responsibilities to a dedicated Head of Operations, but will ultimately ensure:

6.3.4.1 local policy and procedures are created, developed, monitored and updated and incorporate both the requirements of the KGS Health & Safety Policy and Framework and any relevant national health & safety legislative requirements required by any enforcing authority.

6.3.4.2 A health & safety committee meets at least termly and reports on relevant performance issues, planned improvements issues and any findings from any internal or external inspection, audit or regulatory visit.

6.3.4.3 suitable and sufficient funds, people, materials and equipment are provided to meet health & safety requirements.

6.3.4.4 All those designated with health & safety responsibilities are provided with adequate training and support to enable relevant objectives and targets to be met.

6.3.4.5 Carry out and regularly review risk assessments to identify proportionate and pragmatic solutions to reducing risk

6.3.4.6 Communicate and consult with the Executive Head and Senior Leadership Team (SLT) on matters affecting health and safety

6.3.4.7 Encourage staff to identify and report hazards so that we can all contribute towards improving safety

6.3.4.8 that emergency procedures are in place at all locations for dealing with health and safety issues

6.3.4.9 maintain our premises, provide and maintain safe plant and equipment

6.3.4.10 only engage contractors who are able to demonstrate due regard to health & safety matters provide information, instruction and supervision for employees

6.3.4.11 regularly monitor performance and revise policies and procedures to pursue a programme of continuous improvement

6.3.4.12 lead by example and ensure a positive and proactive health & safety culture is promoted throughout the organisation

6.3.5 *Heads of Departments and Departmental Managers*

Heads of Department are responsible for the standards of health & safety in their area of responsibility including that of the staff and students under their supervision.

In addition to the general responsibilities for all teacher and all employees' departmental heads shall ensure:

6.3.5.1 inform visitors and contractors working in their department of the appropriate hazards, controls and emergency procedures

6.3.5.2 All concerns, accidents, incidents and near misses are reported, investigated and appropriate preventative and corrective actions are taken in accordance with the relevant procedures.

6.3.5.3 they communicate and consult with staff on health and safety issues

6.3.5.4 they encourage staff to report hazards and raise health and safety concerns

6.3.5.5 equipment is maintained in a safe condition including any statutory examinations

6.3.5.6 Health and safety training requirements for staff is identified, undertaken and recorded to ensure staff are competent to carry out their work in a safe manner

6.3.5.7 they communicate and consult with other employees on health and safety issues

6.3.6 All Teachers

In addition to the general duties of all employees, Teachers in their specific area of responsibility shall ensure;

- 6.3.6.1 risk assessments are completed, recorded and regularly reviewed and safe teaching practices are developed and implemented
- 6.3.6.2 they supervise their staff and pupils to ensure lessons and activities are carried out safely
- 6.3.6.3 they encourage staff and student to report hazards and raise health &, safety concerns
- 6.3.6.4 concerns, accidents, and 'near miss' incidents in the department are reported, investigated and recorded with relevant corrective and preventative actions taken.
- 6.3.6.5 equipment is maintained in a safe condition
- 6.3.6.6 personal protective equipment where required is provided and that staff and pupils are instructed in its use
- 6.3.6.7 hazardous substances are stored, transported, handled and used in a safe manner according to manufacturers' instructions and established rules and procedures
- 6.3.6.8 agreed safety standards are maintained, particularly those relating to housekeeping
- 6.3.6.9 Fire safety and emergency precautions are well known and practices.
- 6.3.6.10 all relevant health & safety documents are maintained and made available to all others.

6.3.7 All Employees

These responsibilities apply to all staff teaching and non-teaching anywhere in the KGS and should be incorporated into the local Code of Conduct and or Staff/Employee Handbook. This will include actions likely to constitute gross misconduct and result in immediate dismissal.

All colleagues, regardless of specific responsibilities have a shared responsibility and duty to take reasonable care of themselves and other persons who may be affected by their actions or omissions and must;

- 6.3.7.1. *be familiar with the KGS's Health & Safety Policy and use the health & safety guidelines to guide their thinking and action.*
- 6.3.7.2. following all health & safety instructions, information and training provided.
- 6.3.7.3. familiarizing themselves with the principal hazards and controls identified in any relevant Risk Assessment for their work activity and by using the correct tools, equipment and protective clothing.
- 6.3.7.4. wear any relevant staff/employee badge, at all times
- 6.3.7.5. dress appropriately, sensibly and safely when on school premises and for the task being undertaken

- 6.3.7.6. conduct themselves in an orderly manner in the workplace and refrain from any antics or pranks and not intentionally or recklessly interfere with anything provided in the interests of health, safety or welfare.
- 6.3.7.7. follow any fire or emergency procedures and comply with all hazard/warning signs and notices displayed on the premises
- 6.3.7.8. must not undertake any activity, that they do not have permission or have not been appropriately and properly trained in.
- 6.3.7.9. report to their line manager any;
 - all incidents, accidents or near misses relating to health and safety
 - any defective, faulty or damaged equipment or material
 - improvement ideas or suggestions to eliminate or reduce hazards and or improve ways of working

6.3.8 All Contractors

Contractor can introduce significant risk to the school and all work should be managed in accordance with the requirements set out in the Control of Contractors section of this framework and as a minimum all contractors must:

- 6.3.8.1. sign in at the reception where they will be issued with a visitor's pass and informed of the school's fire and emergency procedures and any relevant health & safety rules.
- 6.3.8.2. wear a visitor's badge at all times and hand this badge in and sign out on leaving the school
- 6.3.8.3. comply with the rules of the school and any relevant risk assessment or procedure created by the contracting company or imposed by the school.
- 6.3.8.4. dress appropriately, sensibly and safely when on school premises and for the task being undertaken
- 6.3.8.5. conduct themselves in an orderly manner in the workplace and refrain from any antics or pranks
- 6.3.8.6. use all safety equipment and/or protective clothing as required by the school and as indicated in the risk assessment
- 6.3.8.7. maintain all equipment in good condition and must not use any defective equipment and ensure that any relevant inspection or test certificate is available.
- 6.3.8.8. take reasonable care of their own health & safety and report all incidents, accidents or concerns to a member of school staff.

6.3.9 All Visitors

All visitors (*including parents on school premises outside of normal student drop off and collection times*) must;

- 6.3.9.1. sign in at the main Security Gate where they will be issued with a visitor pass and an information leaflet of the school's fire and emergency procedures and any relevant health, safety & safeguarding rules.
- 6.3.9.2. wear a visitor's badge at all times and hand this badge in and sign out on leaving the school
- 6.3.9.3. follow any relevant fire and emergency procedures and other health & safety rules.
- 6.3.9.4. take reasonable care of their own health & safety and report all incidents, accidents or concerns to a member of school staff.

6.3.10 All Students

All students have a role in ensuring the health & safety of themselves and others, specific rules will be incorporated into the school local [behaviour policy](#) but as a minimum all students must:

- 6.3.10.1. cooperate with teachers and school staff on health & safety matters.
- 6.3.10.2. not interfere with anything provided to ensure their own health & safety or that of others.
- 6.3.10.3. take reasonable care of their own health & safety and report all incidents, accidents or concerns to a teacher or member of school staff.

6.4 Arrangements for Health & Safety

6.4.1 General Risk Management

General risk management covers the overarching approach to the management of Health & Safety. How the school plans, delivers, monitors and improves performance in this critical area.

Health & Safety Committee

An independent challenge and good governance are critical to successful health and safety management and to ensure local strategies, processes and controls are appropriate and effective. Therefore, the whole school is required to demonstrate;

- 6.4.1.1. The existence of a formal Health & Safety Committee, Forum or Steering Group.
- 6.4.1.2. The committee has representation from staff, Health & Safety Coordinator, and leadership.
- 6.4.1.3. The committee has documented formal terms of reference including but not limited to;
 - Approval of local health & safety policies and procedures
 - Oversight of serious accident, incidents
 - Monitoring of performance using;
 - Internal and external inspection and audits reports
 - Damage or impairment reports of systems and equipment
 - Incident data / trend analysis
 - Reports following any drill or practice of emergency procedures
 - Consideration of health & safety in capital projects / building work.

- 6.4.1.4. The committee meets at least once per term.
- 6.4.1.5. Formal documented minutes and associated actions are recorded, reviewed and available for all staff on request.
- 6.4.1.6. The meetings are minuted and held on record

National and Local Statutory and Regulatory Requirements

Compliance with local laws and regulatory requirements is considered the base standard and the schools are required to demonstrate these at all times.

- 6.4.1.7. Adequate knowledge and understanding of national and local health and safety related legislation, other relevant standards and guidance applicable to all aspects of their operation.
- 6.4.1.8. Periodic review of legislation and other standards takes place at least annually and includes consideration of any planned changes and their implementation.
- 6.4.1.9. Contact details of relevant regulators and enforcement authorities are recorded and kept up to date
- 6.4.1.10. Any visit by a regulatory or enforcing body is recorded and shared with all relevant departments and senior group members.

Health & Safety Responsibility

Clarity of roles and responsibility supported by the appropriate knowledge, training and other skills are critical to developing a culture of accountability, to which the whole school are required to demonstrate;

- 6.4.1.11. All staff are aware of their specific roles and responsibilities relating to health and safety.
- 6.4.1.12. All staff have the necessary health and safety training to fulfil their roles and responsibility including; induction training on joining the school, regular refresher training and relevant specialist training to their specific job.
- 6.4.1.13. A named individual with specific responsibility for coordinating health and safety activity.

Health & Safety Information, Instruction, Training & Supervision

Training in health and safety is essential to create competent employees at all levels within the school to enable them to make an effective contribution to health and safety.

The school is required to demonstrate appropriate procedures for the provision of information, induction, initial, on-going and refresher training for all staff suitable to their role and activities, along with appropriate supervision to assess the adequacy of training and individual performance.

Specific technical training will be required for various tasks and activities, many detailed in this framework below. As a minimum the following general health & safety training must be completed;

6.4.1.14. All employees will receive;

- Access to the online Educare training courses which cover Health, Safety & Safeguarding.
- Induction and on-going refresher training covering the specific hazards and controls of the school
- Annual health & safety training including fire safety (via an online computer-based training course or the same content via a facilitated workshop)

6.4.1.15. Hazard Identification & Risk Assessment

Hazard identification and risk assessment is fundamental to everything in health & safety, it is not a simple paperwork exercise to be undertaken in isolation but should be used to talk about risk, what is practical to achieve and how to continuously improve effectiveness and performance. The whole school is required to demonstrate;

6.4.1.16. A documented hazard identification and risk assessment process that;

- Identifies relevant hazards
- Considers who may be harmed (including students, staff, contractors, visitors & the public)
- Evaluates the risk and identifies necessary controls
- Documents significant findings
- Is regularly reviewed;
 - Following significant change,
 - As a result of an incident,
 - Or at least annually.

6.4.1.17. Those leading the risk assessment process have been appropriately trained and follow the Inspired Guide to Risk Assessment.

6.4.1.18. Hazard identification and risk assessments involve those who are undertaking the assessed activity e.g. teachers, administrators, maintenance workers, catering staff.

6.4.1.19. That assessment considers the special and unique needs of specific individuals e.g. individuals with a disability, special needs, young workers below the age of 18, lone workers or new and expectant mothers.

6.4.1.20. Control measures identified in assessments are communicated to all relevant parties and are implemented in practice.

6.4.1.21. Copies of assessments are available for all to view on request.

6.4.2 Fire Safety & Emergency Management

The British School aim is to prevent fires from starting and where the worst does happen, our aim is to ensure the safe evacuation of students, staff and visitors as well as preventing the fire from spreading to minimize damage.

Fire Risk Assessment

The British School aims to use a robust risk assessment to ensure adequate controls are put in place to prevent a fire from starting, control its spread and mitigate any loss or damage. The whole school are required to demonstrate;

- 6.4.2.1. A documented fire risk assessment has been completed for each building on the campus covering
 - Identification of potential sources of ignition (including arson), fuel and oxygen
 - Fire prevention controls including building fabric, construction and operation controls
 - Fire detection and raising the alarm, covering all those at risk
 - Evacuation and fire-fighting measures
- 6.4.2.2. Fire risk assessments has been completed by Health & Safety coordinator.
- 6.4.2.3. Fire risk assessments have been reviewed at least annually or following significant change to building occupancy, use or after any construction or building work.
- 6.4.2.4. Controls or recommendations identified in the fire risk assessment are implemented and monitored.

Fire Safety Training & Evacuation Drills

Khalil Gibran School Rabat recognises that practical simulations and drills are an effect way to enhance other training to ensure everyone knows what to do in an emergency. The wholes school is required to demonstrate;

- 6.4.2.5. All staff have completed bi- annual fire safety awareness training.
- 6.4.2.6. Fire safety information concerning reporting of fires, raising the alarm and evacuation is communicated to all students, contractors and visitors.
- 6.4.2.7. That a fire evacuation drill is completed during the school day at least every term and that details of the drill and any lessons are documented and acted upon.
- 6.4.2.8. That specific evacuation plans exist for those who need additional help to evacuate e.g. those with physical disability or other special needs.
- 6.4.2.9. Annual visit and inspection takes place with a visit from Moroccan Civil Defense.

Note: *Unplanned evacuations caused by malicious or accidental triggering of alarms can be used to satisfy the requirement above in addition to any planned drills taking place.*

Operational Standards

The school aims that simple practical steps to prevent or mitigate fire are implemented and checks incorporated into day-to-day operations. The whole school are required to demonstrate;

- 6.4.2.10. A documented process for identifying all those on campus in the event of an evacuation.
- 6.4.2.11. Trained fire wardens exist to coordinate an evacuation and account for all those on campus and to contact the emergency services.
- 6.4.2.12. That critical information is passed to the emergency services e.g. location of shut off valves, fuel storage, hydrants etc.
- 6.4.2.13. All escape routes are clearly marked, signposted and unobstructed.
- 6.4.2.14. All emergency exit doors are easy to open without the need for a secondary device e.g. combination/key and are well maintained so they open with ease.
- 6.4.2.15. Fire muster points are sufficient distance from buildings and free from other hazards
- 6.4.2.16. That potential sources of ignition are identified and controlled including an effective smoking policy restricting smoking to designated areas.
- 6.4.2.17. Combustible waste is stored in such a manner so as to ensure that there is not a build-up of material internally in classrooms, office areas, corridors and stairwells or externally in waste storage areas.
- 6.4.2.18. All flammable and explosive substances are identified and stored according to the relevant standards, documented on Material safety data sheet or packaging.
- 6.4.2.19. Any hot works (welding, soldering, sparks from cutting or grinding) performed by contractors are adequately controlled outside of school hours.
- 6.4.2.20. Any minor building or maintenance works that impact the fire integrity of the building, such as drilling through walls, removing ducting or inspection hatched are appropriately controlled.

Equipment Maintenance & Testing

The school recognizes that ongoing inspection and maintenance of equipment is critical to ensure its ongoing effectiveness. The whole school are required to demonstrate;

- 6.4.2.21. All fire detection, alarms and control systems are competently installed and maintained in accordance with manufacturer's requirements.
- 6.4.2.22. Fire alarms are tested and recorded weekly. Alarm/call points must be tested in rotation.
- 6.4.2.23. All emergency lighting is tested quarterly and a full battery test completed annually.
- 6.4.2.24. Fire extinguishers are checked monthly and serviced 6th monthly and are easily accessible for use in an emergency.
- 6.4.2.25. Isolation or impairment of any fire safety equipment or system for maintenance or due to fault or damage must be formally recorded and notified to the Executive Head / Head of Operations.

Additional short-term controls must be agreed to ensure continuation of fire safety until systems are repaired/re-commissioned.

Other Emergency Management

The whole school is required to demonstrate;

- 6.4.2.26. A documented process for identifying other relevant potential emergency situations that may impact the school.

Additional Internal Guidance & Templates

- 6.4.2.27. *Template Fire Risk Assessment*
6.4.2.28. *Drill record sheet*

6.4.3 Food & Catering Services

The school aims to provide high quality food and catering services to its staff and students, providing a well-balanced diet to support the demands of the educational environment. In addition to being conscious of the range and quality of food available the school recognizes that poor food hygiene can pose significant risk and impact on large numbers of students if not appropriately managed. The following requirements apply equally to in-house food and catering operations and those outsourced to third part suppliers and contractors.

Food Safety Training & Personal Hygiene

The whole school are required to demonstrate;

- 6.4.3.1. A documented process for the training of all staff who handle, prepare or serve food have been trained in accordance with relevant local requirements and includes all the relevant elements covered in this Food & Catering Services section.
- 6.4.3.2. Training is completed on induction and prior to any contact with food, with refresher training completed at least every three years
- 6.4.3.3. Training records should be kept and be available for inspection on request
- 6.4.3.4. Clear personal hygiene standards are communicated and implemented by all those who handle, prepare and serve food, including;
- 6.4.3.5. Specific hand washing requirements
- 6.4.3.6. Restrictions and control associated with hair, facial hair, jewelry including piercing and make-up including false nails, eyelashes and perfume.

- 6.4.3.7. Restrictions and controls concerning ill health, cuts, open wounds, boils and discharges from the nose, mouth and ears.
- 6.4.3.8. Restriction and controls for visitors who temporarily access kitchens or food preparation areas.

Building Fabric & Equipment

The whole school is required to demonstrate;

- 6.4.3.9. All walls, floors and ceiling are constructed to ensure ease of cleaning and to prevent ingress of pests.
- 6.4.3.10. All doors and windows that are regularly opened to the outside are screened to pest ingress and other contamination into food preparation areas.
- 6.4.3.11. All catering equipment is inspected and maintained in accordance with local Ministry requirements.
- 6.4.3.12. All food preparation and serving areas have separate hand washing facilities, including hot and cold water, soap/antibacterial handwash and means of drying.
- 6.4.3.13. There is sufficient equipment to prevent cross contamination between cooked and raw foods and between meat, fish, and other high-risk ingredients in preparation and storage.
- 6.4.3.14. There are clear cleaning and disinfecting routines and schedules for all food storage, preparation and serving areas and equipment.
- 6.4.3.15. Cleaning equipment and materials for food areas is stored separately from general cleaning materials and equipment.

Food Preparation & Serving

The whole school are required to demonstrate;

- 6.4.3.16. A documented process for the monitoring and management of food deliveries including the need to manage product recalls.
- 6.4.3.17. A documented process for monitoring and recording temperature controls that includes;
- All parts of the supply chain including delivery, bulk storage, local storage, preparation, cooking and service.
 - Specific temperature restrictions for cooking, cooling, re-heating and maintain temperatures for hot/cold service/display
 - Restriction on the use of raw eggs in food preparation
- 6.4.3.18. A documented process for assessing hazardous activities and critical control points for each dish/preparation
- 6.4.3.19. A documented process for managing the 14 major food allergens in food stored, prepared and served.

- 6.4.3.20. A documented process for the use of glass in food preparation and serving areas, including breakages and prevention of glass contamination.
- 6.4.3.21. A documented process of food labelling and stock rotation/control where all food items are labelled with use by dates and for prepared food a date prepared and disposal date.

Other Food Safety Requirements

The whole school is required to demonstrate;

- 6.4.3.22. A documented process for the management of pest control, including preventative and reactive measures.
- 6.4.3.23. A documented process for the regular auditing of food hygiene arrangements by an independent person at least every term which includes a review of all the controls and associated documentation detailed above.
- 6.4.3.24. A documented process for assessing temporary food preparation and service for specific events e.g. internal or external social events, fundraising etc. to ensure broad compliance with the requirements above.

Social Kitchens, Shared Facilities, Vending Machines and Tuck Shops

Social kitchens and shared facilities for staff and students to prepare drinks or their own food do not need to meet the full standards detailed above. Similarly, vending machines and tuck shops selling confectionery are low risk and can be controlled in a more pragmatic way. In all instances schools and offices need to demonstrate.

- 6.4.3.25. All equipment provided is installed, inspected and maintained in accordance with local national requirements and manufacturers requirements and those detailed in section 9.0 below.
- 6.4.3.26. All food supplied for general consumption is identified and separated from food provided for personal use by individuals.
- 6.4.3.27. Provision of handwashing facilities including hot and cold water, soap/antibacterial handwash and means of drying is provided in or near to these areas.
- 6.4.3.28. Food past its use by date or that appears to have been left is disposed of.
- 6.4.3.29. Suitable waste bins are provided and regularly emptied.
- 6.4.3.30. Regular cleaning, disinfection and pest control takes place.
- 6.4.3.31. Use of these areas is monitored to ensure all those using them do so in a considerate manner and cleaning after themselves and leaving facilities in a usable state.

6.4.4 Transport, Driving & Traffic Management

The school aims to ensure that the contractor who provides the school transport manages to protect everyone by making sure the vehicles are properly maintained and traffic management systems are logical and efficient to protect both drivers, pedestrians and other road users.

General Vehicles & Transport Management

Vehicles and transport, includes any car, mini bus and other similar equipment, regardless of their size, fuel type and whether they are used on private land or the public highway. All schools must demonstrate;

- 6.4.4.1. All vehicles and transport are serviced, inspected and maintained in accordance with both national regulatory requirements and manufacturers recommendations.
- 6.4.4.2. All drivers have the appropriate license, training and other checks required for the vehicle they are driving.
- 6.4.4.3. All vehicles are in good condition and daily inspections/defect checks are completed for all vehicles every day that they are used. All other days should be evidenced as 'Not in Use'
- 6.4.4.4. General safe operation of vehicles includes;
 - No vehicle should be left running or unattended with the key in it at any time.
 - Brakes are applied whenever the vehicles is stationary
 - Drivers use three points of contact when getting on and off / in and out
 - Vehicles never carry passengers unless designed to do so
 - Any maximum load, height and speed restrictions are known and adhered to
 - Trailer are only used where the vehicles is designed to use them with a suitable towing bolt or attachments

School Transportation

School transportation (buses, coaches, minibuses) for carrying students must meet additional requirements, irrespective of whether the service is owned or contracted to a third party. The contractor is required to demonstrate;

- 6.4.4.5. Relevant transport operators' licenses are in place from Ministry regulators or enforcing authorities.
- 6.4.4.6. In all circumstances every student has a seat and a seat belt is provided.
- 6.4.4.7. As good practice the driver is accompanied by a bus monitor to ensure the correct behaviour of students and avoid driver distractions. (Bus monitors are adults and must be provided with adequate information and training as well as comply with relevant safeguarding requirements)
- 6.4.4.8. Where students are dropped at locations other than the school for collection by parents/guardians, the bus must not depart until parents/guardians have arrived. No student

should ever be left unattended at a drop off point. If students are dropped at home, they must be observed entering the property.

Traffic Management

KGS aims to set some general principles for safe traffic management but recognizes these will need to be assessed regularly for specific needs. The whole school demonstrates:

- 6.4.4.9. Unobstructed, one-way traffic flow / avoiding reversing (consistent with highway)
- 6.4.4.10. Segregation of pedestrians and vehicles
- 6.4.4.11. Segregation of delivery trucks and lorries from other vehicles
- 6.4.4.12. Speed control
- 6.4.4.13. Clear, unambiguous directional signage and markings
- 6.4.4.14. The traffic management assessment is reviewed following any significant change or at least annually.
- 6.4.4.15. A visual traffic management plan showing vehicle routes, parking and other and road markings as well as hazardous areas such as pedestrian areas, blind spots etc.
- 6.4.4.16. An effective system in place to prevent delivery vehicle 'drive offs' during loading and unloading.
- 6.4.4.17. That any bus, lorry or truck does not reverse in the campus during school hours.
- 6.4.4.18. Hi vis vests are worn by all staff and visitors in close proximity to moving vehicles or who are directing traffic.
- 6.4.4.19. Speed restrictions are adhered to and any speeding driver is respectfully challenged.

6.4.5 Construction Design & Management and Control of Contractors

KGS recognizes that construction, maintenance, repair and building works are high risk activities. In order to manage risk in a practical way construction work and building projects are generally categorized in one of three ways;

- 6.4.5.1. Small or low risk projects such as basic or routine maintenance, repair and refurbishment activity, examples include, painting and decoration, minor plumbing or electrical works, refurbishment of classrooms, toilets etc. These will usually be managed internally using internal maintenance resources/tradesman or regular outsourced maintenance providers.
- 6.4.5.2. Medium risk projects or more complex maintenance, repair or refurbishment involving additional risk, examples include, minor structural works, complex electrical work, work on gas or pressure systems or involving specialist skills. These projects may be managed internally where competency exists but would usually require external tradesmen, technicians and specialist skills.

6.4.5.3. Large, complex and high-risk projects involving significant structural alterations, installation of new service supplies, new buildings or complex management of multiple contractors and trades. These activities will usually be outsourced and fully managed and delivered by third parties. With the relevant part of a building or campus essentially isolated from the main school and handed over for the duration of the works.

School Records and Construction File

The school is required to create and maintain accurate records of any building maintenance, repair, refurbishment and construction. These records should include;

- 6.4.5.4. As built drawings, service diagrams or plans.
- 6.4.5.5. Details of construction methods, materials and any recommendation for future dismantling and disposal.
- 6.4.5.6. Detail of any manufacturer's installation, maintenance and disposal guidance and information.
- 6.4.5.7. Any architect or contractor risk assessment relating to the design and build process.
- 6.4.5.8. Relevant inspection, test and certification.

Construction Design & Management

Regardless of project size, it is important to ensure everyone understands their role and responsibilities concerning the activities involved in the project.

Note: *The roles and responsibilities identified below may be carried out by individuals, groups or organisations and that an individual, group or organization may undertake multiple roles at the same time. E.g. for an internally delivered classroom refurbishment a competent maintenance manager may act as the designer and main contractor.*

The School needs to ensure they;

- 6.4.5.9. the appointment of competent designer/architect and main contractor
- 6.4.5.10. the allocation of sufficient time and resources to complete the project safely
- 6.4.5.11. the provision of all relevant information to the designer/architect and main contractor relating to the health & safety of the school
- 6.4.5.12. the designer/architect and main contractor carry out their responsibilities detailed below
- 6.4.5.13. obtain the relevant sign off of designs;
- 6.4.5.14. for small / low risk projects, designs are signed off locally by the Head of Operations and the Executive Head
- 6.4.5.15. For medium and large/complex projects, designs are signed off by the Executive Head and Regional CEO.

The Designer/Architect needs to ensure they;

- 6.4.5.16. plan manage and coordinate health & safety during the planning and pre-construction phase
- 6.4.5.17. complete appropriate risk assessments when preparing or modifying design to take account of health & safety risks covering installation, use, maintenance and eventual demolition of the building or structure
- 6.4.5.18. apply all appropriate and relevant national statutory requirements, building standards and regulations, notification and consents.
- 6.4.5.19. apply all appropriate KGS design requirements and standards.
- 6.4.5.20. ensure coordination and cooperation between the school, designer/architect and main contractor.
- 6.4.5.21. supply copies of relevant information to be incorporating to the school's records / construction file
- 6.4.5.22. sign in at the reception where they will be issued with a contractor pass and informed of the school's fire and emergency procedures and any relevant health & safety rules.
- 6.4.5.23. wear a contractor badge at all times and hand this badge in and sign out on leaving the school

The Main Contractor needs to ensure they;

- 6.4.5.24. Plan manage and co-ordinate health & safety during construction
- 6.4.5.25. Liaise with the school and designer/architect
- 6.4.5.26. Organising co-operation between contractors and co-ordinating their work including site inductions and sharing of information.
- 6.4.5.27. Ensure reasonable steps are taken to avoid unauthorised access to the construction area or site
- 6.4.5.28. Collate and co-ordinate the relevant information to be incorporated into the school's record / construction file and hand this over to the school at the end of the project.
- 6.4.5.29. sign in at the reception where they will be issued with a contractor pass and informed of the school's fire and emergency procedures and any relevant health & safety rules.
- 6.4.5.30. wear a contractor badge at all times and hand this badge in and sign out on leaving the school

All Contractors need to ensure they;

- 6.4.5.31. Plan manage and coordinate health & safety for the work under their control
- 6.4.5.32. Coordinate their activities with other through the main contractor
- 6.4.5.33. Supply copies of relevant information to be incorporated into the school's record / construction file
- 6.4.5.34. Sign in at the reception where they will be issued with a contractor pass and informed of the school's fire and emergency procedures and any relevant health & safety rules.

6.4.5.35. Always wear a contractor badge and hand this badge in and sign out on leaving the school

Management of Contractors

KGS recognises that often it will need to bring in resources and expertise to properly manage its operations. In circumstances where third parties are used it is essentially that they are properly vetted, are introduced to the specific nature of our schools and that they meet all safety and safeguarding standards required but also our own requirements and that any deficiencies in performance are managed promptly and effectively. The whole school is required to demonstrate;

- 6.4.5.36. A documented process for the formal approval and vetting of third-party suppliers and contractors to assess their competency and to address health, safety & safeguarding issues prior to appointment.
- 6.4.5.37. All contractors are inducted to the school and receive relevant health, safety and safeguarding information including emergency procedures.
- 6.4.5.38. All work undertaken by contractors is monitored and checked by a nominated member of school staff with appropriate knowledge and skills to determine that they are working as required.
- 6.4.5.39. Specific controls are in place where work undertaken by staff and or contractors involves;
 - Entry into a confined space (enclosed space, tank, pit or void with restrict access and or ventilation)
 - Work on any energized system (gas, electrical, hydraulic or other pressure system) where practical systems should be isolated and de-energized prior to work
 - Hot work involving flames or other heat sources
 - Work on or near hazardous areas e.g. fragile or unprotected roofs, water, hidden or buried services

Note: For large or complex projects the Main Contractor will usually take on board the responsibilities for management of other contractors on construction sites and may implement their own management of contractor's procedures. In such cases these procedures should cover the requirements detailed above.

6.4.5.40. General Repair & Maintenance

To ensure the general repair and maintenance of buildings, the school is required to demonstrate;

- 6.4.5.41. All building structures and fabric is fit for purpose including;
 - Floors, wall and ceiling are structurally sound and constructed of suitable materials
 - Walkways and corridors are in good condition and slip resistant, either by design or by addition of matts, paint etc.
 - Stairs are fitted with a secure and substantial handrail on at least one side of every staircase, except at points where a handrail would obstruct entry or exit, are well lit without shadow cast over them and in good condition and well maintained.

- Floors, walls and ceiling are in good decorative order
- All public areas adequately heated, cooled or ventilated
- All areas adequately lit
- All glass and glazing is safety glass, or designed not to shatter.

6.4.5.42. All buildings are monitored and maintained to avoid obvious forms of property defect such as;

- Damp, rot and other mould or fungal growth
- Plant growth and penetration into buildings
- Damage to internal floor surfaces including holes, broken, chipped tiles
- Pothole and other damage to external ground surfaces, pathways and roads
- Damage or faults in the building structure
- Leaks (esp. near electrical equipment)
- Broken windows, doors and other glazing
- Damage or breaches in boundary walls/ fences
- Standing surface water, blocked guttering and drains

6.4.5.43. Adequate housekeeping standards are maintained to help prevent incidents, slips, trips & falls, including;

- Regular cleaning of all internal areas
- Adequate waste bins with emptying regimes (no overflowing bins)
- External areas free from litter
- Any leaks, spills or flooding that are on site should be appropriately managed
- Appropriate spill kits are in place where spills of hazardous material are possible e.g. workshop, near fuel or bulk chemical storage areas.
- Pedestrian walkways are clear of hazards.

Legionella & Water Hygiene

Water containing biological agents and other contamination poses a significant risk to health, the school aims to ensure all water is free from contamination and meets any nationally recognised water quality standards. The whole school is required to demonstrate;

A process for the identification, inspection and maintenance of water systems to prevent legionella, other water borne biological hazards or contamination. This process should include;

- Proper cleansing and disinfections at least annually of high risk systems e.g. cooling equipment, air conditioning systems that are not closed systems.
- Water distribution system being free from dead legs, redundant or unused pipework
- Water temperature checks are made at least bi - weekly.

- All drinking water points are clearly marked

Electrical Installations

The whole school is required to demonstrate;

- 6.4.5.44. All fixed electrical installations have been designed, installed, inspected, serviced and maintained by a competent electrician and in accordance with both national regulatory requirements and manufacturers recommendations
- 6.4.5.45. All fixed electrical installations should be inspected every 5 years
- 6.4.5.46. Any defect or damage is identified and repaired promptly and as necessary any appropriate isolation measures are taken where defect or damage poses a risk to continued use.

Gas Safety

The whole school is required to demonstrate;

- 6.4.5.47. All gas installations have been designed, installed, inspected, serviced and maintained by a competent electrician and in accordance with both national requirements and manufacturers recommendations
- 6.4.5.48. All gas installations should be inspected annually
- 6.4.5.49. Any defect or damage is identified and repaired promptly and as necessary any appropriate isolation measures are taken where defect or damage post a risk to continued use.

Pressure Systems

The whole school is required to demonstrate:

- 6.4.5.50. All pressure systems (pneumatic or hydraulic) are competently designed installed and maintained in accordance with regulatory requirements and manufacturers recommendations
- 6.4.5.51. All systems should have a documented schematic showing the main equipment and features of the system including distribution pipework.
- 6.4.5.52. All systems must be formally inspected at least annually including a pressure/integrity test.
- 6.4.5.53. All pipework and equipment should be marked to show what is contained within the system.

Trees & Invasive or hazardous plant species

The whole school is required to demonstrate that;

All trees are assessed to ensure they do not pose a threat to the safety of students, staff or the public from falling branches and or being blown over.

6.4.5.54. Assessments should focus on high risk trees, large, diseased or damaged, those near to buildings and or public areas, roads and car parks.

6.4.5.55. Where appropriate advice should be gained from a competent arborist

6.4.5.56. Any preventative or remedial work including high risk activity including use of chainsaws, work at height etc. is appropriately managed

Any invasive, hazardous or property damaging species of plant is to be identified, recorded and subject to a specific management plan to ensure it is maintained, removed and disposed of in order to prevent it from spreading. If applicable, the national requirements for the notification and control of invasive species needs must be followed.

Work at Height

Work at height poses obvious risk, however it is not only working at height above ground level that presents a hazard fall from ground level into excavation, pits, stair and even pathways where the sides drop away at steep inclines all pose a risk of both people falling or objects falling onto others. The whole school is required to demonstrate;

- i. all work activities that involve working at height are identified and assessed and where practical the need to undertake work at height is eliminated
- 6.4.5.57. all areas where there is a risk of falling from height are adequately protected to prevent falls or access is restricted to prevent any member of staff, student, contractor or visitor entering the area without additional controls being put into place.
- 6.4.5.58. An inventory of all equipment for accessing and working at height needs to be created and maintained. This includes all hop ups, step ladders, mobile steps, trestles, portable scaffold towers, elevated work platforms either static or powered.
- 6.4.5.59. Those using access or other work at height equipment need to be adequately trained in its use and in accordance with any manufacturer's recommendations and local requirements.
- 6.4.5.60. all equipment for access and working at height must be
- identified and recorded on a central register
 - secured when not in use to prevent unauthorized use.
 - visually inspected prior to use and free from obvious defects
 - formally inspected at least termly.
- 6.4.5.61. Steps and ladders are primarily for access purposes only. Only minor work can be performed using this equipment and users should maintain 3 points of contact at all times and not reach out from the immediate area of the steps or ladder. In all other cases a proper working platform will be required.

Environmental Management

The school recognises its operations may have from time to time an impact on the local environment. In order to ensure it meets its obligation to reduce the impact wherever possible. In addition to other requirements set out elsewhere in this document that impact on the environment, The whole school is required to demonstrate;

- 6.4.5.62. Energy use is effectively management including
- No open burning is permitted on site, either for heating purposes or for waste disposal.
 - All electrical & gas appliances must be properly maintained in accordance with manufacturer recommendation
 - Processes are in place to monitor and manage energy use (electricity, gas, fuel oil etc.)
 - The location of lighting and heating controls is known and the controls are functioning correctly
 - Lighting controls (switches, timers, daylight detectors)
 - Heating controls (thermostats & timers)
 - Other energy controls, e.g. mains sockets switches
- 6.4.5.63. Waste is effectively managed and disposed of appropriately and in accordance with local requirements including;
- Documentary evidence of the legal transfer/disposal of all waste.
 - Hazardous waste is kept separate from other wastes and is disposed of in line with local requirements
 - Waste is segregated on site and placed in the correct bins, bags or containers
 - Staff and students are informed of waste disposal processes and encouraged to segregate and reduce waste.

6.4.6 Tools & Work Equipment

From time to time tools and equipment are used across our school by staff and students. The school aims to ensure that all equipment is used for the purpose for which it was designed and is used correctly and is properly inspected and maintained to ensure the safety of all.

Tools & Equipment

In addition to the specific requirement detailed below, general good practice applies to the provision and use of all work equipment. The whole school is required to demonstrate;

- 6.4.6.1. all equipment is designed for the purpose for which it is being used.
- 6.4.6.2. all users have familiarity training to identify significant hazards and their associated controls.
- 6.4.6.3. all equipment use is regularly supervised to ensure it is being used correctly.
- 6.4.6.4. appropriate controls including guards, personal protective equipment is being used in accordance with any activity risk assessment
- 6.4.6.5. all equipment is used, cleaned, stored, inspected and maintained in a manner to prevent damage and in accordance with ~~both local national~~ regulatory requirements and manufacturers recommendations.
- 6.4.6.6. Appropriate and relevant records are kept of training, inspection tests and maintenance of work equipment.

Portable Electrical Equipment

Portable electrical appliances encompasses any equipment or tool that is plugged into the mains electrical supply either directly or means of a charging point etc. Broad range of equipment large and bulky such as photocopiers, fridges, freezers to smaller items such as soldering irons, phone chargers. To ensure the safety of portable electrical appliances and equipment, the whole school is required to demonstrate;

- 6.4.6.7. All portable electrical equipment is being used for the purpose it was designed and within its operational capacity and within local regulatory requirements and manufacturers recommendation
- 6.4.6.8. An inventory of all portable electrical equipment is created and maintained.
- 6.4.6.9. Staff & students using the equipment;
 - Are informed to follow manufacturer's recommendations for safe use including the use of any personal protective equipment that may be required, (gloves, safety glasses etc.)
 - Visually check the equipment for obvious signs of damage prior to use
 - Report any defects they notice when using equipment. *(This is especially relevant for hand held equipment or older equipment where there is a higher risk of electric shock)*
 - Ensure that parts prone to damage that would expose conductors (such as cables) do not trail across areas that expose them to damage or trail across wet surfaces
 - Electrical equipment brought into school by staff & students is not permitted for personal use.

Fixed Machinery

Fixed machinery encompasses any equipment that is wired or connected directly to its source of power (electrical, gas, hydraulic, pneumatic) Definition covers a broad range of equipment but would tend to include equipment with higher energy needs or is bulky e.g. woodworking and metalworking

equipment, industrial catering equipment etc. To ensure the safety of fixed machinery, The whole school is required to demonstrate;

- 6.4.6.10. All machinery is being used for the purpose it was designed and within its operational capacity and within local requirements and manufacturers recommendation
- 6.4.6.11. An inventory of all fixed machinery is created and maintained.
- 6.4.6.12. Each item of machinery has a specific risk assessment and safe operating procedure.
- 6.4.6.13. Any machinery with exposed moving parts is fitted with suitable guards and interlocks (fixed or movable guards)
- 6.4.6.14. Guard and interlocks are checked and recorded weekly
- 6.4.6.15. All emergency stops and isolators are clearly labelled to identify the machine they isolate and within reach of the operator.
- 6.4.6.16. All emergency stops and isolation devised are inspected weekly and tested at least once a year.
- 6.4.6.17. Adequate controls are in place for noise and dust to be implemented.
- 6.4.6.18. Staff & students using machinery;
 - Are informed and follow manufacturer's recommendations for safe use including the use of any personal protective equipment that may be required, (gloves, safety glasses etc.)
 - Visually check the equipment for obvious signs of damage prior to use
 - Report any defects they notice when using equipment.

Lifting Operations & Lifting Equipment

Lifting equipment is a term used to describe any equipment or accessory used to support or lift a load. This includes; cranes, lifts, hoists, powered platforms, lifting bolts, ropes, slings, shackles and spreader bars. The school aims to ensure all lifting equipment is appropriate for the task it is used for and that all lifting operations are correctly planned and executed to ensure everyone's safety. The whole school is required to demonstrate;

- 6.4.4.20. Lifting operations should be planned and conducted by trained and competent individuals with knowledge and experience of;
 - Local regulatory requirements concerning lifting operations and equipment
 - Load calculations
 - Correct slinging and securing techniques
- 6.4.4.21. An inventory of all lifting equipment is created and maintained.
- 6.4.4.22. All lifting equipment is subject to a documented inspection by a competent person every;
 - 12 months for general lifting equipment
 - 6 months for equipment lifting people
 - 6 months for lifting accessories such as rope, chains, sling, shackles etc.

Storage Racking & Shelving

Racking and shelving can support significant weight and poses a risk of collapse or falling if overloaded. The whole school is required to demonstrate;

- 6.4.6.19. All racking and shelving is installed, inspected and maintained according to manufacturer recommendations
- 6.4.6.20. All racking and shelving has an identified maximum load, covering individual shelves and the unit as a whole.
- 6.4.6.21. Where significant storage occurs, floors are appropriately designed to take the load of any loaded racking and shelving, this is particularly relevant for mezzanine or temporary buildings/floors and or older buildings.
- 6.4.6.22. Climbing on any racking or shelving unit is not permitted, ladders or access platforms must be provided.
- 6.4.6.23. All racking and shelving is visually checked for damage and defects monthly.
- 6.4.6.24. Any damage to racking or shelving is reported and where appropriate damage racking or shelving is unloaded and marked as out of use until repairs are completed.

6.4.7 Security & Access Control

The school aims to ensure a safe and secure environment for learning, including the provision of appropriate systems to control access to internal and external areas and to prevent damage or loss through malicious acts.

6.4.7.1. Security Risk Assessment

As with general health & safety requirements, a robust risk assessment is critical to ensuring the security of the school. The whole school is required to demonstrate;

- 6.4.7.2. A documented risk assessment for the security and access needs of the school.
- 6.4.7.3. Assessments have been completed by a trained and competent person, with knowledge and experience of;
 - 6.4.7.3.1 General security practices and modern security systems and equipment
 - 6.4.7.3.2 Understanding of local and national security requirements
 - 6.4.7.3.3 Understanding of local security threats and issues
 - 6.4.7.3.4 Consulting with relevant regulatory and enforcing authorities.
- 6.4.7.4. The assessment covers;
 - 6.4.7.4.1. Requirements for designated security staff, manned guarding and training requirements

- 6.4.7.4.2. High risk students, staff, assets and buildings
- 6.4.7.4.3. Requirements for the school day, evening, night time, weekends and holiday period
- 6.4.7.4.4. Securing of the school perimeter
- 6.4.7.4.5. Access control on perimeter access points
- 6.4.7.4.6. Access control on external building access points
- 6.4.7.4.7. Key and keyholder management (including physical and electronic keys and passes)
- 6.4.7.4.8. Securing of windows and other route of entry
- 6.4.7.4.9. Security of electronic systems, data and information.
- 6.4.7.4.10. Recording who is on the school site (students, staff, visitors, contractors)
- 6.4.7.4.11. Management of visitors and contractors
- 6.4.7.4.12. Lone working and night working
- 6.4.7.4.13. Intruder detection and alarm systems
- 6.4.7.4.14. CCTV and other surveillance systems
- 6.4.7.4.15. Monitoring and patrol services
- 6.4.7.4.16. Vacant buildings and property
- 6.4.7.4.17. Security incident investigations (Management of accident, injuries and ill health)
- 6.4.7.4.18. Liaison with regulatory and enforcing authorities and emergency services

6.4.7.5. Security Systems

The whole school is required to demonstrate;

- 6.4.7.6. All security systems, e.g. CCTV, surveillance and detection systems, are designed, installed, inspected and maintained by competent technicians and in accordance with local regulatory requirements and manufacturers recommendations.
- 6.4.7.7. Any defect, damage, impairment or failure to any security system is reported, documented and is repaired in a timely manner.

6.4.8 Specific Educational Activities

Achievement in academic subjects sports and performing arts are the three areas of the schools approach to education, it is therefore paramount that these facilities and activities are managed to ensure the safety of students and staff. In addition to general requirements for health and safety certain activities carry specific hazards and risks, the necessary controls for these activities are detailed below.

6.4.8.1. Science & Laboratory Safety

Note: Best practice information, advice, supporting material and template procedures concerning laboratory safety and practical lessons are available to all Heads of Department through CLEAPSS (Consortium of Local Education Authorities for the Provision of Science Services)

The whole school is required to demonstrate;

- 6.4.8.2. Laboratories and preparation areas have adequate;
 - 6.4.8.2.1. space for the number of students
 - 6.4.8.2.2. ventilation
 - 6.4.8.2.3. fire detection and firefighting equipment (see Fire Risk Assessment above)
 - 6.4.8.2.4. local isolation for any gas supplies into the laboratory
 - 6.4.8.2.5. first aid equipment including eyewash and drench shower facilities is available in relevant laboratories.
- 6.4.8.3. appropriate trained and competent staff to prepare for practical lessons and co-ordinate health and safety in the laboratory and associated preparation area.
- 6.4.8.4. a risk assessment exists for all science practical's, identifying all appropriate hazards and necessary controls and considering;
 - 6.4.8.4.1. details of the proposed activity
 - 6.4.8.4.2. the age and ability of the persons likely to do it
 - 6.4.8.4.3. details of the room to be used, i.e. size, availability of services and whether or not the ventilation rate is good or poor
 - 6.4.8.4.4. any substance(s) possibly hazardous to health
 - 6.4.8.4.5. the quantities of substances hazardous to health likely to be used, including the concentrations of any solutions class size
 - 6.4.8.4.6. any other relevant details, e.g. high voltages, heavy masses, etc.
- 6.4.8.5. general laboratory safety rules are clearly displayed and communicated to all students
- 6.4.8.6. suitable personal protective equipment as identified in any risk assessment e.g. eye protection, gloves, laboratory coats/apron are provided and worn by students and staff.
- 6.4.8.7. Students studying GCSE or higher are required to wear a laboratory coat for all chemistry and biology practicals. Where these are provided by the school
- 6.4.8.8. All laboratories and preparation rooms are locked when unsupervised by a teacher or laboratory technician
- 6.4.8.9. all chemicals are stored in suitable containers, clearly labelled with their name, concentration and any relevant hazard warning label.
- 6.4.8.10. all chemicals have an associated hazard card and or material safety data sheet.
- 6.4.8.11. chemicals are securely stored in a manner to reduce the risk of exposure and undesirable chemical reactions;
- 6.4.8.12. flammable and highly-flammable liquids, strong acids, strong alkalis and poisons are stored in appropriate locked cabinets with suitable ventilation to the external atmosphere.
- 6.4.8.13. production of waste chemicals is minimised through managing preparation quantities and re-use and where disposal is necessary chemicals are disposed of in an environmentally-

responsible manner in accordance with relevant legislation. Some chemicals may be disposed of through dilution and disposal into the sewer, others will require storage and collection for specialist treatment. Storage of waste chemicals should be limited to containers no larger than 25 litre and each container stored with an appropriate tray to contain any spillage. All waste disposal records need to be kept on file

6.4.8.14. A process for the clean-up, storage and disposal of broken glassware

6.4.8.15. A process for the management of spills including;

6.4.8.2.1. Minor spills of any amount which do not give rise to significant quantities of toxic or highly-flammable fumes are dealt with by teachers using a 'spill kit' provided for this purpose.

6.4.8.2.2. Major spills involving the escape of toxic gases and vapours or of flammable gases and vapours in significant concentrations. (Small amounts can be 'major spills' if split in small rooms.) Staff are trained in the appropriate procedures which may involve calling the Fire Service. This training is supported by regular drills arranged by the Head of Department.

6.4.8.16. Any fume cupboards are appropriate for the chemicals used in them, are visually checked prior to use and formally tested, inspected and maintained at least annually, with appropriate records kept on site.

6.4.8.17. Any pressure vessels such as autoclaves and pressure cookers need periodic inspection and test at least annually and should be treated in accordance with the requirements of the pressure system outlined above.

6.4.8.18. all radiological sources are identified and secured and are under the control of a dedicated and competent individual who is responsible for supervising their storage, use and disposal.

6.4.8.19. Sports fields, play area, gyms and equipment

The school aims to ensure all sports and games halls, fields, gyms, pitches, courts and other facilities, and associated equipment are safe to use ensuring students can benefit from exercise, individual and team challenges in a controlled and safe manner. The whole school is required to demonstrate;

6.4.8.20. A specific documented risk assessment for sports and games activities.

6.4.8.21. All facilities, halls, buildings, pitches, fields and courts are fit for purpose and are covered by general building property requirements detailed above including the suitability of all playing surfaces.

6.4.8.22. All sports, games and gym equipment is fit for purpose, is installed, inspected and maintained in accordance with manufacturers recommendations.

- 6.4.8.23. All appropriate clothing and protective equipment relevant to the specific sport or game is provided, worn, is in good condition, maintained and free from defects or damage.
- 6.4.8.24. Any teacher, trainer or coach is trained by a recognised body and competent to perform their duties in the relevant sport or game and has knowledge and understanding of the health and safety implications of that sport or game and the necessary controls.

6.4.8.25. Swimming & swimming pools

Swimming is a high hazard activity presenting not only the risk of drowning but also exposure to waterborne diseases, treatment chemical as well as thermal shock and contact with pool walls and floors, obscured underwater objects and entanglement with weeds or being carried away by fast moving currents or water flow. For all swimming and water-based games conducted either on the school site or owned by a third party, the whole school is required to demonstrate;

- 6.4.8.26. A specific documented risk assessment for managing swimming activities and water-based games.
- 6.4.8.27. Swimming and water-based games e.g. water polo, are only conducted in a specifically designed and built swimming pool, never in open water such as lakes, rivers or ponds.
- 6.4.8.28. All swimming pools must have;
- 6.4.8.2.1. Appropriate water treatment plant and regular water quality checks
 - 6.4.8.2.2. Have safe means of access (integrated steps / ladders etc.)
 - 6.4.8.2.3. Clearly marked water depths
 - 6.4.8.2.4. Be supervised by trained and competent lifeguards
 - 6.4.8.2.5. Appropriate, private changing and shower facilities
 - 6.4.8.2.6. Documented Normal Operating Procedures (NOP) and Emergency Operating Procedures (EOP)
- 6.4.8.29. All staff involved in teaching / coaching swimming must be trained in life saving and or the pool provided with adequate competent lifeguards.

6.4.8.30. Performing Arts

The school aims to ensure performing arts are conducted safely to ensure students benefit from developing skills and talents, building confidence through performance and personal expression. The whole school is required to demonstrate;

- 6.4.8.31. A specific documented risk assessment for performing arts activities
- 6.4.8.32. All facilities, stages, theatres, practice and performance areas are fit for purpose and are covered by general building property requirements detailed above.

- 6.4.8.33. All performing arts equipment is fit for purpose, and is installed, inspected and maintained in accordance with manufacturers recommendations.
- 6.4.8.34. Any teacher, trainer, tutor or coach is trained by a recognised body and competent to perform their duties in the relevant performing art and has knowledge and understanding of the health and safety implications of that performing art and the necessary controls.

6.4.9 Medical, First Aid, Incident Management, Health & Welfare

The short term and long-term health and welfare of students and staff is paramount. The school aims to inform students and staff to improve their general health and wellbeing as well as to ensure prompt and professional treatment when ill health occurs or in the event of an unplanned incident or injury.

6.4.9.1. Medical & First Aid Provision

The whole school is required to demonstrate;

6.4.9.2. An assessment has been made to ensure the adequate provision of medical and first aid trained personnel, treatment facilities and equipment.

6.4.9.3. The assessment includes consideration of;

- a. The number of students and staff
- b. Any known specialist medical needs of student or staff
- c. The presence particularly hazards on the school site (activities such as swimming, use of hazardous machinery and the presence of venomous fauna or flora)
- d. The availability of emergency services and other external help
- e. Availability of trained personnel to provide cover out of hours or to cover annual leave and sickness absence.
- f. The ongoing maintenance and management of facilities and equipment
- g. The replenishment of consumable items.

6.4.9.4. Management of medication and drugs

The school recognises that both student and staff may be required to take medication and other prescribed and non-prescribed drugs as part of the treatment or mitigation of a range of medical conditions. The school aims to ensure where such medications are required these are properly stored and administered to ensure correct use. The whole school is required to demonstrate;

- 6.4.9.5. A specific process for the management, storage, and administration of medicines and drugs
- 6.4.9.6. Parents notify the school in writing of medicines provided for their children.

6.4.9.7. Where over the counter medicines are administered by school staff, parents have pre-authorized the administration of these medicines in advance and this pre-authorization is renewed each academic year.

6.4.9.8. All medicine and drugs are stored in a secure/locked location and in accordance with storage conditions e.g. refrigerated.

6.4.9.9. All instances of medicine or drugs being administered are recorded giving full detail of the person administering, to whom, when and the dose.

6.4.9.10. Management of accidents, injuries and ill health

If an accident, injury or ill health occurs it is the school's aim to ensure appropriate treatment of the individual as well as proper investigation to understand exactly what has occurred, identify root causes and learn to prevent a recurrence in the future. The whole school is required to demonstrate;

6.4.9.11. Once an injury or ill health is identified appropriate treatment is given to the individual(s) concerned.

6.4.9.12. Where appropriate additional support from emergency services is sought as quickly as possible.

6.4.9.13. Details of all treatment for any injury or ill health must be recorded.

6.4.9.14. Where a student is injured or suffers ill health on school premises or whilst under the schools control, parents must be formally notified of any illness or medical treatment provided either by the school or emergency services.

6.4.9.15. All staff and students are able to and are encouraged to report injuries, incidents and near misses.

6.4.9.16. All incidents, injuries and near misses are recorded on a central log

6.4.9.17. All reported incidents, injuries and near misses have been investigated locally, investigation should include;

- a. The gathering of evidence,
- b. Analysis to build a factual and objective picture of events and a timeline
- c. Review of findings and identification of root causes
- d. Identify and implement preventative and corrective actions using the Just Culture Model

6.4.9.18. All injuries sustained on the school site, resulting in hospital treatment, or absence from school or work for more than one day (including the day of the injury) must be reported to the Executive Head & Head of Operations.

6.4.9.19. Welfare Provision

The school aims to provide a working environment that accommodates the day to day needs of its staff. The whole school is required to demonstrate;

- 6.4.9.20. The adequate provision of welfare facilities for staff. As a minimum the following facilities should be available (or a suitable alternative)
- Kettle
 - Microwave,
 - Toilets,
 - Soap,
 - Hand drying facilities
 - Drinking water
 - A warm place with seats and a table available for breaks.
- 6.4.9.21. Facilities should be clean and there should be an organised system for keeping the facilities clean.
- 6.4.9.22. There are appropriate facilities for: new and nursing mothers and disabled staff.
- 6.4.9.23. The school must be free from obvious pest infestation.
- 6.4.9.24. Washroom facilities should be of an adequate number for the number of staff.
- 6.4.9.25. Evidence that specific health requirements related to the seasons and the external environment for example sunscreen, drinking water and weather appropriate clothing are communicated to staff
- 6.4.9.26. Lighting in all areas must be sufficient to enable persons to work safely. This includes lighting in external areas (especially during winter months or night working) and in internal areas.
- 6.4.9.27. Ventilation should be suitable to enable a supply of fresh air commensurate with the room and its contents.
- 6.4.9.28. Clothing designed to protect staff from the elements is available.
- 6.4.9.29. Similar provision of welfare facilities is required for all students, consideration needs to be given to the availability of these facilities and the number of students. Additional facilities will be required where student board at the school

6.4.9.30. *Ergonomics & Manual Handling*

The school aims to eliminate or reduce manual handling and consider ergonomics in the design of workstations and operational tasks. Where manual handling is required, staff have the equipment and knowledge to lift and move items safely. The whole school is required to demonstrate;

- 6.4.9.31. Activity risk assessments consider manual handling (where the risk exists) and suitable controls are identified.
- 6.4.9.32. Manual handling equipment (e.g. pump truck, sack trucks, trolleys) must be available and in good order to allow staff to avoid or minimise physical effort when moving or lifting

- 6.4.9.33. Where staff work primarily at a desk or workstation for a majority of the working day, an assessment of the ergonomics of that workstation should be undertaken. This assessment should include;
- The availability of sufficient space to complete work activities
 - The desk or workstation should be properly constructed, of a suitable size and height.
 - Chairs should be designed for computer use, be on castors and have adjustable head and back rests to allow for personal adjustment.
 - Computers and IT equipment should be easily accessible and fit for purpose, screens should be adjustable and at correct height for user and the keyboard in line with screen
 - Ancillary equipment should be provided where necessary to help improve ergonomics, e.g. foot rest, wrist rest, document holders,
 - Environmental factors such as lighting, noise, glare from windows should also be considered and controlled as necessary.
- 6.4.9.34. All colleagues must be trained and refreshed annually in manual handling training
- 6.4.9.35. Staff should notify the school of any existing injury or medical condition that may make them more susceptible to a workplace injury. (*This is subtly different from a disability as disability is defined as "if you have a physical or mental impairment that has a 'substantial' and 'long-term' negative effect on your ability to do normal daily activities". Generally, a pre-existing injury will either not be substantial or long-term*)
- 6.4.9.36. Where staff have notified the school of an existing injury or medical condition suitable controls need to be agreed and documented. This might include restrictions on certain activities for a defined period.

vi. Hazardous Substances & Physical Agents

Hazardous substances can take many forms and include: products containing chemicals, fumes, dusts and vapours, mists, gases and asphyxiating gases as well as biological agents such as living organisms that cause disease, bacteria, viruses, moulds & fungi and parasites. Physical agents include other factors that affect the health of users through exposure to that factor, including ionising and non-ionising radiation, noise & vibrations. The whole school is required to demonstrate;

- 6.4.9.37. That controls are in place for the safe storage of chemicals and all hazardous substances including where appropriate restricting access and or limiting the quantities stored.
- 6.4.9.38. Controls are in place for the safe disposal of chemicals and hazardous substances
- 6.4.9.39. Controls for the safe use of chemical and hazardous substances are in place and communicated to all who use them, including provision of ventilation, uses of Personal Protective Equipment (PPE) such as gloves, safety glasses/goggles, laboratory coats, aprons, dust/face masks etc.

- 6.4.9.40. Excessive noise is identified and controlled on the school site. (i.e. sources of noise where normal conversation can't be heard at a distance of 2m,}
- 6.4.9.41. Areas where exposures to chemicals, hazardous substances or physical agents must be adequately signposted to show the nature of the hazard and any protective measures required.
- 6.4.9.42. All PPE used must provide the appropriate protections required, it must be in good condition, and users are trained to use it correctly and it is stored and cleaned correctly. Any defects are reported so items can be repaired or replaced.

6.4.9.43. Management of Stress & Mental Health

The school recognises that in the modern world staff and students are subject to a fast pace and changing world with pressures from both within the working environment and in people's private and home life. We aim to create an environment where concerns about stress and mental health can be raised and addressed in an open and understanding manner. By staff leading by example in this important area it is possible to create an environment that can better identify and manage mental health and wellbeing issues in our student population. The whole school is required to demonstrate;

- 6.4.9.43.1. Implementation of appropriate mental health and wellbeing provision for students.
- 6.4.9.43.2. All heads of schools, and Management have adequate training and knowledge concerning work related stress and mental health.

7.0 Check

7.1 Reactive Monitoring & Measurement of Performance

The Role of the School

Reactive monitoring of events including accidents, incidents, cases of ill health or property damage provide an opportunity to check performance and learn from mistakes and improve control measures. The detailed requirements for incident reporting and investigation are detailed in 6.5.10 above. However, in addition to these requirements for each incident the school must demonstrate;

- 7.1.1. A review at least termly of recent incidents and accidents to
- ensure appropriate application of the just/fair culture model
 - identify any underlying trends or common themes
 - ensure timely and effective closure of any corrective or preventive actions identified during an investigation.
- 7.1.2. A review of other reactive indicators such as;
- property damage

- recent insurance claims
- staff sickness absence
- staff turnover
- student visits to school nurse
- student general and sickness absence

8.0 Act

8.1 Reviewing Performance & Oversight

8.1.1 Health & Safety performance is reviewed through a formal reporting and review process to provide independent challenge and oversight.

8.1.2 KGS reports critical issues or matters of immediate concern through an established weekly reporting process. Regional CEOs consolidate all their school's weekly reports into one regional weekly report for review by the Group CEO. This reporting process is owned by the CFO and incorporates relevant Health, Safety & Safeguarding matters.

8.1.3 At the end of each year, a comprehensive review of performance is undertaken incorporating all proactive and reactive indicators and output from the Group operational assurance and governance processes to prepare an annual Health, Safety & Safeguarding report for review and challenge by the main Inspired Board and to inform future improvement strategies and plans.

8.2 Operational Assurance – 3 lines of defence

8.2.1 This Operating Framework details 'What we must do to comply with the local Ministries and other standards'. The assurance process provides objective evidence that we do what we say and this forms part of the wider Corporate Governance requirements for internal control.

The First Line of Defence

The first line of defence covers operational checking. It consists of an Annual Self-Assessment reminding school leaders of requirements, prompting a validation response and where appropriate generation of a corrective action. The executive head/ heads of schools and head teachers may delegate checking/action to others in the school but are responsible for their final submission.

The Second Line of Defence

The second line of defence is independent checking from outside the school and the direct line management chain either to the Regional CEO or Education Director. Health & Safety Reviews will be conducted and will focus on the broader requirements of the HSS management system and framework.

Completion of Health & Safety Reviews will be risk based.

The Third Line Defence

The third line of defence is independent checking at a higher level by internal audit or external providers. As a principle the Internal Audit purpose is to test the Health & Safety functional strategy and processes are adequate and implemented, not to simply to repeat activity from the first and second line of defence.

8.3 Learning Lessons

8.3.1 The KGS's arrangement for communication, investigation, monitoring and review all provide opportunities to learn lessons and avoid repetition of concerns, issues or incidents. This approach is underpinned by the Just / Fair Culture Model.

8.3.2 An Annual review of all information, data and reports is completed towards the end of every year to assess overall performance and the effectiveness of the Health & Safety Management System.

8.3.3 In turn lessons from the previous year feed into and inform Planning & Risk Profiling activity for the following year providing a continuous learning and improvement programme.