



Health and Safety Statement & Policy

1. Statement of General Policy

- 1.1 Reed's School and Ripley Court School (the School), are committed to, as far as is reasonably practicable, the following aims:
 - a. All staff are safeguarded fully in respect of health safety and welfare whilst at work.
 - b. Pupils and members of the public, including parents, who enter School premises are not exposed to health and safety risks during their visit to the sites.
 - c. No work is carried out by the School or a contractor, that might expose staff, pupils or members of the public to hazards to health unless suitable and sufficient assessments of the risk are made and necessary measures to prevent or control the risk have been introduced.
 - d. All contractors can demonstrate they have suitable arrangements for securing adequate health and safety standards including, where necessary, a written statement of policy.
- 1.2 The Governors acknowledge that the School has a responsibility to take all reasonable precautions to provide and maintain working conditions which are safe, healthy and comply with all statutory requirements and good codes of practice. As the most senior executive, the Executive Headmaster is responsible for the implementation of this policy within the School. Matters that cannot be resolved at this level must be referred to the Governing Body.
- 1.3 The School will take all such steps, as are reasonably practicable, to meet its health and safety objectives, which are:
 - a. To provide conditions and systems of work for all staff which prevent danger to health. This requires that risk assessments be carried out as appropriate to enable hazards and risks to be identified to enable the necessary standards of safety to be adopted and enforced.
 - b. To maintain all plant and equipment properly so that none can be used knowingly when it presents any risk to the safety of staff or the public.
 - c. To provide a safe environment for all authorised visitors to School premises.
 - d. To provide comprehensive information, instruction, training and supervision to secure the health and safety at work of all staff and pupils.
 - e. To keep under constant review the health, safety and welfare of all staff, pupils and members of the public by the School's management at all levels.

- f. To organise safe arrangements for the handling and transport of articles and substances.
 - g. To introduce and maintain up-to-date fire procedures and documents and update staff and pupils regularly on these.
 - h. To follow all government guidance in relation to health and safety matters including infectious diseases.
- 1.4 This policy is dependent on the cooperation of every person who works for the School and all members of staff have a legal duty to:
- a. Take reasonable precautions in safeguarding the health and safety of themselves and others.
 - b. Observe all health and safety rules and procedures as laid down by the School and use all health and safety equipment provided.
 - c. Alert management to any potential hazard that they may have noticed and report all accidents, incidents and near misses that have led to, or may lead to, illness or damage.
 - d. Make sure that no person uses a prescribed dangerous machine unless they have been fully instructed as to the dangers and the precautions to be observed and have either received sufficient training in work at the machine or are being supervised by someone with a thorough working knowledge and experience of the machine. No person under the age of 18 years should be allowed to dismantle or clean a prescribed dangerous machine.
- 1.5 This Policy applies to both Schools, including the Early Years setting at Ripley Court School.
- 1.6 Health and safety matters are reviewed at appropriate governors' meetings to provide the necessary policy direction. The management board and the senior leadership team of the school are responsible for coordinating day-to-day activities and making sure that this policy is implanted. Heads of department are responsible for health and safety within their areas of responsibility. The Schools' Health & Safety Committees, chaired by the Operations Director & RCS Bursar, or their delegate, with members from all appropriate departments within the School, are the forum for the discussion of any issues. The Governor with responsibility for Health & Safety attends these meetings.
- 1.7 The School will hold Health & Safety Committee meetings not less than once per term in order to formally consult with staff. Representatives from all parts of the School will be invited to attend. Necessary health and safety issues will be discussed at these meetings and any points raised will be duly minuted and actioned accordingly. Copies of the minutes of these meetings will be made available to staff on request.
- 1.8 The School appoints competent third parties to provide the necessary technical and practical health and safety assistance and information and to provide independent monitoring of high-risk matters in the School.
- 1.9 The Health & Safety Policy will be monitored to make sure it is working as intended and effective and will be reviewed and updated as necessary.

2. Introduction

- 2.1 It is the policy of the School that their operations shall, so far as is reasonable practicable, be conducted in such a manner as to ensure the health, safety and welfare of all School employees and any other persons who may be affected by its activities, including pupils, contractors, visitors and members of the public.
- 2.2 In accordance with the Health and Safety at Work etc. Act 1974, the School recognises and accepts its responsibilities for, so far as is reasonably practicable, the health, safety and welfare of pupils, staff and others using school premises or participating in school-sponsored activities. The School believes that the prevention of accidents, injury or loss is essential to the efficient operation of the School and is part of the education it provides for its pupils.
- 2.3 It is the aim of the School that a high standard of safety shall be achieved and maintained across the school sites and throughout all its activities. The School believes that only the adoption of safe methods of work and good practice by each individual can maximise everyone's health and safety.
- 2.4 Whilst a statutory duty exists to comply with the Health and Safety at Work Act 1974, and all subsequent and relevant legislation and related regulations, this shall be regarded as the minimum standard expected.
- 2.5 In order to meet these objectives, the School will direct the provision of health, safety and welfare within the workplace, including the provision and maintenance of plant and equipment, systems of work and a workplace and environment which are safe and without risks to health. All staff are made aware of their responsibilities in this and that it is their duty to everything reasonably practicable to assist in the achievement of the objectives set out in this policy.
- 2.6 The School will take all reasonable steps to identify and reduce hazards to a minimum; however, all employees have a duty to work in a safe and responsible manner, and to carry out their duties in such a way so as not to endanger the health, safety and welfare of themselves or others. They shall be encouraged to submit suggestions for the improvement of standards in health and safety within the School.
- 2.7 It is the duty of all teaching staff to make sure that all pupils under their supervision work in a safe and responsible manner and are fully aware of all necessary precautions and procedures.
- 2.8 Any member of staff, regardless of position or duties, who is found to be deliberately or consistently negligent in the performance of their duty with relation to the School's Health and Safety Policy will be subject to disciplinary action which may include dismissal.
- 2.9 In the event that any pupil is deliberately or consistently negligent with respect to their own safety or that of others, the School may at its discretion exercise its right to exclude that pupil in accordance with the its policy relating to behaviour and exclusion.

2.10 The Health and Safety Coordinator for the School is currently the Director of Operations & RCS Bursar.

3. Organisation

3.1 Duties of the Governing Body

3.1.1. In the discharge of its duties, the Governing Body, in consultation with the Reed's Bursar, has a responsibility to:

- i) Make itself familiar with the requirements of the Health & Safety at Work, etc. Act 1974, The Management of Health and Safety at Work Regulations, 1999 (updated), and any other health and safety legislation and Codes of Practice which are relevant to the work of the School.
- ii) Oversee an enforceable policy for the provision of health and safety throughout the School and annually assess the effectiveness of this policy.
- iii) Monitor health and safety performance.
- iv) Carry out any accident investigation as may be necessary and review the Health & Safety policy accordingly.
- v) Nominate a Governor for Health and Safety and for this Governor to attend Health & Safety Committee Meetings.

3.1.2. The Board of Governors has a responsibility to oversee the provision of:

- i) A healthy and safe place for staff and pupils to work.
- ii) Sufficient information, supervision, training, and instruction to enable all employees to carry out their duties in a safe manner, not placing themselves or others at risk.
- iii) Necessary safety and personal protective equipment and clothing.
- iv) Adequate welfare facilities.
- v) A Governor representative to attend the School Health & Safety Committee which will act as a consultation vehicle for the passing of information regarding health and safety matters between themselves and members of staff and provide the Governors with evidence of the effectiveness of this policy.

3.2 Duties of the Executive Headmaster

3.2.1. The Executive Headmaster has overall responsibility for the implementation of the School's Health and Safety Policy and for ensuring that the School fulfils its statutory obligations with respect to the health, safety and welfare of all employees, pupils and others.

3.2.2. The Executive Headmaster oversees the development and implementation of safe working practices and conditions for staff, pupils, visitors, and any other person using the premises or engaged in activities sponsored by the School. The responsibility is shared with the Reed's Bursar and the Director of Operations & RCS Bursar who together will take all reasonably practicable steps to achieve this end alongside members of the Senior Leadership Teams at each school, Heads of House, Heads of Department, Line Managers, School Nurses/Receptionists, Teaching and Support Staff.

3.3 Duties of the Reed's Bursar and Secretary to the Governors

3.3.1. The Reed's Bursar will, as far as is reasonably practicable:

- i) Be familiar with the requirements of all relevant legislation, codes of practice and guidelines, and will update the Board of Governors appropriately.
- ii) Review procedures on an annual basis to check safety audits are carried out.
- iii) Organise the provision of health and safety information and training and ensure staff are made aware of any relevant risk assessments relevant to their duties.
- iv) Encourage staff, pupils and others to promote health and safety.
- v) Monitor accident and incident information, investigate if necessary and summarise to identify trends and minimise future risk.
- vi) Make reports as necessary under RIDDOR.

3.4 Duties of the Director of Operations & RCS Bursar

3.4.1. The Director of Operations & RCS Bursar will, so far as is reasonably practicable:

- i) Be familiar with the requirements of all relevant legislation, codes of practice and guidelines.
- ii) Review all health and safety policies.
- iii) Carry out risk assessments so that hazards may be identified, and control measures put in place.
- iv) Engage suitably qualified and experienced specialist contractors to conduct risk assessments for fire, legionella and asbestos and ensure works are undertaken in line with recommendations.
- v) Use reasonable endeavours to ensure that adequate resources, financial and otherwise, are committed to achieving the objectives of this policy and immediately bring to the notice of the Executive Headmaster or the Governors the details of any shortfalls.
- vi) Provide advice to members of staff carrying out department risk assessments, and to the FORS committee when planning events.
- vii) Provide recommendations for improvements to systems, plant or machinery in order to comply with any relevant statutory legislation or codes of practice or to improve the general health and safety of the School.
- viii) Instruct that all necessary safety notices are in place.
- ix) Oversee the provision of information for staff, instruction and training in health and safety and ensure staff are made aware of any relevant risk assessments pertinent to the carrying out of their duties.
- x) Investigate and report back to the Reed's Bursar (who is also Secretary to the Governors) on all reported accidents, injuries and near misses, and any incidents or circumstances reported by any member of staff, pupil or other person using the premises regarding breaches of safety regulations or dangerous occurrences.
- xi) Rectify without delay, any defects in the premises, plant or equipment which may affect the health and safety of staff, pupils, or others.

- xii) Maintain all necessary documentation required by any relevant health and safety legislation.
- xiii) Provide advice to staff about any relevant changes in statutory legislation or codes of practice.
- xiv) Check the licences and competence of staff driving school vehicles on an annual basis.
- xv) Organise regular fire alarms tests.
- xvi) Organise regular visual inspections of portable firefighting equipment and annual safety checks.
- xvii) Organise termly fire drills.
- xviii) Organise staff training in fire procedures.
- xix) Instruct that, where applicable, all statutory notices are displayed, and any relevant registers are kept up to date and available for inspection.
- xx) Take on the role of Responsible Person with respect to Legionella Management.
- xxi) Make reports as necessary under RIDDOR in the absence of the Reed's Bursar.
- xxii) Convene and Chair the Health & Safety Committee for each school and ensure that these are run effectively.
- xxiii) Monitor near miss information, investigate if necessary, and summarise to identify trends and minimise future risk.

3.4.2. The Director of Operations & RCS Bursar will oversee any of the above responsibilities which are delegated to other members of the Bursary department, including the Compliance Manager, the Fire Safety Officer, the Site Operations Manager etc.

3.5 The Duties of Senior Leadership Team members, Heads of House, Heads of Department and Line Managers

3.5.1. The Senior Leadership Team members, Heads of House, Heads of Department and Line Managers will make sure, as far as is reasonably practicable that:

- i) They are familiar with the requirements of all health and safety legislation and codes of practice relevant to the work of their area of responsibility.
- ii) They will be responsible to the Executive Headmaster for the implementation of the School's health and safety and safe working practices relevant to their department or area of responsibility.
- iii) Within their own area/department:
 - a. Safe methods of working are implemented throughout.
 - b. Health and safety regulations, rules, procedures and codes of practice are applied effectively.
 - c. Staff, pupils and others under their jurisdiction are instructed in safe working practices.
 - d. All plant, machinery and equipment are adequately guarded.
 - e. Reasonably practicable steps are taken to prevent the unauthorised or improper use of all plant, machinery and equipment.
 - f. Appropriate protective clothing and equipment are used when necessary.

- g. Toxic, hazardous and highly flammable substances are correctly used, stored and labelled and disposed of.
- h. They encourage staff, pupils and others in their department to achieve the highest possible standards of health and safety and follow the appropriate disciplinary procedures for those who fail to consider the health and safety of themselves or others.
- i. They report any health and safety concerns promptly to the Director of Operations and/or the Estates Project Manager.

3.6 External Health and Safety Consultant

- 3.6.1. The Director of Operations & RCS Bursar will arrange as appropriate for external consultants to advise on matters of health and safety within the School.

3.7 The Duties of the Reed's Medical Centre/Ripley Court Receptionists

- 3.7.1. The Reed's Medical Centre Team/Ripley Court Receptionists will be responsible for:
 - i) Maintaining an accurate and up-to-date record of all accidents
 - ii) Keeping statistics and preparing summary reports for the School's Health and Safety Committees.
 - iii) Escorting pupils to hospital where a parent/guardian is unavailable to do so (and informing their parents).
 - iv) Checking that all first aid boxes and eye wash stations are replenished.
 - v) Checking Defibrillator batteries and contents of Defibrillator stations in accordance with the relevant policy of each school.

3.8 The Duties of All Members of Staff

- 3.8.1. All staff should read, so far as is reasonably practicable, the following:
 - i) The requirements of any health and safety legislation and codes of practice relevant to the work of their department.
 - ii) The Health and Safety policy and any other relevant policies as directed by the School.
- 3.8.2. To this end, they will:
 - iii) Take reasonable care of their own health and safety and that of others who may be affected by their acts or omissions at work.
 - iv) Comply with any duty or requirement imposed on them under any of the relevant statutory legislation.
 - v) Avoid conduct which would put themselves or anyone else at risk.
 - vi) Wear any protective clothing and equipment supplied and not wilfully misuse or abuse such equipment.
 - vii) As far as is practicable, ensure health and safety regulations and procedures are being applied effectively.
 - viii) As far as is practicable, seek to ensure that all areas under their supervision or control are kept in a clean and tidy manner

- ix) As far as is practicable, ensure all plant, machinery and equipment are adequately guarded, and report any defects or to other safety hazards encountered.
- x) Not make or permit unauthorised or improper use of plant, machinery and equipment.
- xi) As far as is practicable, ensure that toxic, hazardous and highly flammable substances are correctly used, stored, labelled and disposed of.
- xii) Report any defects in the premises, plant, equipment and facilities which they observe to their line manager or other relevant member of staff
- xiii) Take an active interest in promoting health and safety and the reduction of risks.
- xiv) Attend or promptly complete, all health and safety training assigned to them by the School as their Employer.

3.9 Contractors

- 3.9.1. The Director of Operations & RCS Bursar, along with the Facilities Manager, will work with contractors, so far as is reasonably practicable, to make sure contractors and their sub-contractors conduct themselves and carry out their operations in such a manner that all statutory and advisory safety requirements are met at all times.
- 3.9.2. All contractors and their sub-contractors who work on the School premises are required to undertake, as far as is reasonably practicable, safe working practices by themselves and their employees under the provisions of the Health and Safety at Work, etc. Act 1974 and must pay due regard to the safety of all persons using the premises in accordance with ss.3-4 of the Health and Safety at Work, etc. Act 1974.
- 3.9.3. Further information can be found in the Managing Contractors Policy.

3.10 School Health & Safety Committee

- 3.10.1. The School has an established Health & Safety committee at each School which is the vehicle for the passing of information regarding health and safety matters between the Board of Governors, staff, and pupils. These committees meet termly and are made up of the following:
 - Executive Headmaster (Reed's)/Headmaster (RCS)
 - Bursar and Secretary to the Governors (Vice Chair - Reed's)
 - Governor Representative
 - Director of Operations & RCS Bursar (Chair)
 - Senior Deputy Headmaster (Reed's)
 - Deputy Headmaster (Pastoral)(Reed's)
 - Senior Master (Co-Curricular) (Reed's)
 - Compliance Manager (Vice Chair – Ripley Court)(Reed's & Ripley Court)
 - Director of Sport (Reed's)
 - Head of Little Court (including Nursery)(Ripley Court)
 - Head of Sport & Upper Court (Ripley Court)
 - Head of Rugby (Reed's)
 - Assistant Head - Sixth Form (Reed's)

- Assistant Head – Middle School (Reed's)
- Boarding Head of House (School House)(Reed's)
- Boarding Head of House (The Close)(Reed's)
- Medical Centre Manager (Reed's)
- Office Manager (Ripley Court)
- Reed's School Enterprises (RSE) Manager (Reed's)
- Catering Manager (currently Sodexo) (Reed's)
- Head of Art (Reed's)
- Head of Design and Technology (D&T)(Reed's)
- Head of Science (Reed's & Ripley Court)
- CCF Contingent Commander (Reed's)
- Medical Centre Manager (Reed's)
- Facilities Manager (Reed's & Ripley Court)
- Head Groundsman (Reed's)
- Cleaning Supervisor (Reed's)

3.10.2. It is expected that all members of the committee attend each meeting. On occasion, this may not be possible, and the individual must send their apologies to the Chair and arrange for a member of staff to attend in their absence to represent their area of responsibility.

4. Arrangements

4.1 The School has a number of other policies which cover its arrangements for Health & Safety in greater detail, including:-

- a. Critical Incident Plan (Reed's & Ripley Court)
- b. Eating Disorders Policy (Reed's)
- c. Entonox Policy (Reed's)
- d. Fire Safety (Prevention) Policy (Reed's & Ripley Court)
- e. First Aid Policy and Procedures (Reed's)
- f. First Aid & Administration of Medication Policy (Ripley Court)
- g. Food Allergy Policy (Joint policy for both Schools)
- h. Head Injury & Concussion Policy (Reed's)
- i. Intimate Care Policy (Ripley Court)
- j. Lone Working Policy (Joint policy for both Schools)
- k. Medical Care Policy & Procedure (Reed's)
- l. Medication Policy (Reed's)
- m. Restraint & Reasonable Force Policy (Reed's)
- n. Risk Management Policy (Joint policy for both Schools)
- o. Minibus Policy (Joint policy for both Schools)
- p. Staff Alcohol & Drugs Policy (Joint policy for both Schools)
- q. Staff Mental Health and Wellbeing Policy (Joint policy for both Schools)
- r. Touch & Physical Intervention Policy (Ripley Court)

5. Emergency Plans and Procedures

- 5.1 The Executive Headmaster (Reed's)/Headmaster (Ripley Court) will oversee, as far as is reasonably practicable, that an emergency plan is prepared to cover all foreseeable major incidents which could put at risk the occupants or users of each School. These plans, known as "Critical Incident Plans", will indicate the actions to be taken in the event of a major incident so that everything possible is done to:
- Save life
 - Prevent injury
 - Minimise loss
- 5.2 This sequence will determine the priorities of the emergency plan.
- 5.3 The Reed's plan will be maintained and updated by the Senior Deputy Head and the Reed's Bursar (who is also Secretary to the Governors). The Ripley Court plan will be maintained and updated by the Director of Operations and Ripley Court Bursar.
- 5.4 **Accident and Near Miss logs** – See Director of Operations & Ripley Court Bursar Responsibilities in Section 3.4 above, supported by Medical Centre/Receptionists per section 3.7 above.
- 5.5 **Medication and medical incidents** – see Director of Operations & Ripley Court Bursar in Section 3.4 above, supported by Medical Centre/Receptionist in Section 3.7 above.
- 5.6 Emergency information and contact details: Reception staff keep a list of contact details for pupils and HR hold details for staff. The databases have emergency contact details, and the Critical Incident Plan, held by the SLT and on the Firefly (Reed's)/Staff SharePoint site(Ripley Court), sets out actions to be taken if a serious event occurs. (Also refer to the various School first aid and related policies))
- 5.7 Incidents which require action under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations are detailed in Appendix A. Only the Director of Operations & Ripley Court Bursar and the Bursar and Secretary to the Governors (Reed's School) are authorised to submit a report to the HSE under RIDDOR.
- 5.8 **Fire Procedures – see Fire Risk (Prevention) Policy**
- 5.9 **Supervision of pupils – See Pupil Supervision Policy**
- 5.10 **Lone Working – See Lone Working Policy**
- 5.11 **Visitors – See Visitors Policy**
- 5.12 **Contractors and Trades People**
- 5.11.1. All contractors and tradespeople involved in repair, maintenance or installation work which involves the building, grounds or other facilities will be asked to provide written or other evidence of their suitability to work near children, competence to complete such work and, if the Director of Operations & Ripley Court Bursar requires it, a copy of the contractor's risk assessments/method statements relevant to the work being performed by them, in so far as the work may prejudicially affect the staff and/or pupils of the School, and written confirmation of their insurance carried.

5.11.2. Contractors and Trades People should sign in at the Estates Office at Reed's or at Reception at Ripley Court.

5.11.3. See **Managing Contractors Policy** for further information.

6. Risk Assessment – See Risk Management Policy

7. Educational and/or Residential Visits (Outings) Away from School – see Ripley Court External Visits Policy and/or Reed's Educational, Holidays or Recreational Visits Policy.

8. Machinery and Equipment

- 8.1 Electrical items will be checked for safety by a competent electrical engineer annually. The School will ensure that all machinery and equipment within the School will be maintained in good working order at all times. For so long as any such machinery or equipment is unfit for use it will be marked accordingly. It is the responsibility of staff when issuing equipment to check for obvious signs of damage and report any defects found. Risk assessments are made of the hazards and risks involved in the use of machinery and these are recorded, along with arrangements for servicing.
- 8.2 A record of the servicing and/or maintenance of high risk equipment will be kept by the Head of the relevant department. This should include details of any servicing carried out by third parties. Records should be sufficient in detail to ensure that a particular piece of machinery/equipment can be individually identified. Items should be serviced/maintained in accordance with the manufacturer's recommendations as a minimum. Records of maintenance and servicing undertaken on high risk equipment must be kept and the log kept up to date.

9. Hazardous Substances

- 9.1 The School recognises in the light of COSHH (Control of Substances Hazardous to Health Regulations 1999) the requirement to:
- Undertake assessment of all hazardous materials with respect to usage and risk or require contractors (such as cleaners and caterers) to furnish copies of such assessments.
 - Assemble comprehensive Hazard Data information
 - Instigate suitable control and security measures
 - Make copies of all relevant information readily available to users of hazardous materials. Printed copies of information relating to emergency treatment of associated injuries must be kept in close proximity to the chemicals to minimise the potential for delay in treatment.
 - Staff who regularly use hazardous substances should familiarise themselves with how to treat accidental inhalation or splashes of relevant substances
 - Store chemicals used as part of the Science curriculum in a locked cupboard. Science classrooms and Prep Rooms are kept locked when not in use.
 - Store chemicals used to maintain the swimming pool in a locked space.

- Store chemicals used in the Art Curriculum in a suitable locked container/cupboard.
- Heads of Departments must ensure that their staff are aware of the risks posed by the use of Hazardous Substances. For example, in handling chemicals, inhalation of dust or wood particles. Exposure to these particles should be monitored by the Head of Department and measured against the exposure limits provided by the HSE. Where exposure is considered to be above half of the [EH40/2005 Workplace exposure limits](#), this must be reported to the Director of Operations.

10. Asbestos

- 10.1 The School has a number of buildings where asbestos containing materials are present. The school employs a third party specialist to carry out regular checks on these areas. The Facilities Team maintains the School's Asbestos Management Plan.
- 10.2 The location of asbestos is marked with warning stickers. Staff must not make any penetrations into these areas. Staff should immediately report any damage to areas containing asbestos to the Facilities Team who will take appropriate action.
- 10.3 The Facilities Team is responsible for sharing details of the location of asbestos containing materials with contractors who carry out work on the School site. See also Managing Contractors Policy.

11. Swimming Pool – see each School's individual Swimming Pool Operating Procedure.

12. Personal Protective Equipment

- 12.1 The School will provide, and require the use of, protection equipment when necessary by all its employees. (See paragraph 3.8.1 (d). Employees injured due to lack of wearing protection equipment when necessary may be deemed guilty of professional misconduct.
- 12.2 In particular, special attention should be paid to protective equipment when:
 - Using noisy machinery (Ears)
 - Using gardening or construction machinery or COSHH-controlled substances (Eyes)
 - Using gardening or construction machinery or COSHH-controlled substances (gloves and skin protection)

13. Protective Clothing, Eyewear, Gloves, Aprons and Footwear

- 13.1 It is a statutory requirement under the Personal Protective Equipment Regulations 1992 to wear eye protection when an assessment shows that a risk of injury to the eye cannot be otherwise eliminated.

13.2 Staff and pupils (as indicated) must wear eye protection when involved in any of the following operations:

- Using or dispensing liquids which could cause injury
- When breaking, cutting, dressing, carving stone, metal and glass
- Any other process involving the production of fine particles
- Any work which involves the use of sharp-pointed materials

13.3 Eye protectors must be readily available, well maintained and conform to EN 16321-1:2022 and carry the relevant code for the type of protection offered (1=Impact, 2=Light protection, C=Chemical). They are kept by the caretaker, the groundsman, DT Department, Forest School Leader and the science department.

13.4 Non-allergenic gloves will be worn when washing items following work with food. Caretaking, grounds, and cleaning staff will wear gloves suitable for the task being undertaken. Staff working in Forest School should wear gloves as required for the task being undertaken.

13.5 Appropriate protective clothing will be worn by staff involved in activities which could:

- Lead to entanglement
- Be subject to harmful liquid spillages
- Involve high temperatures or naked flames
- Be of an appropriate type of material in areas exposed to high temperatures and naked flames.

13.6 Aprons and overalls made from synthetic, 'wipe down' materials will be used for all food-based activities.

13.7 Aprons and overalls made from water resistant materials will be used for all wet activities.

13.8 All aprons and overalls will be cleaned regularly.

13.9 Caretaking, grounds staff, design technology teachers and any other staff will be required to wear protective shoes whenever the activity involves lifting, moving and/or cutting heavy items.

14. Training

14.1 Employees will be provided with basic H&S training as part of the induction process. Refresher training will be provided for all employees.

14.2 Further ongoing training will be provided based on the role the employee performs at the School(s). The Deputy Head (Staff)(Reed's only) along with Department Managers/Heads of Department are responsible for identifying any additional training required relating to the individual's specific role.

15. Electricity (Mains)

- 15.1 It is forbidden for any work to be conducted on any live electrical circuits by any member of staff or pupil within either School. Any work on any conductors or circuits shall be carried out only by competent and qualified electricians. All mains-powered electrically-operated tools and equipment will be maintained in good order and subject to regular inspection and testing as appropriate by a competent person. A record of all such tests and inspections shall be kept by the Facilities Manager on behalf of the Director of Operations & Ripley Court Bursar.
- 15.2 If any item of mains powered electrical equipment fails to function properly the user shall immediately cease use of the equipment and report the issue to the Facilities Manager (Reed's) or Caretaker (Ripley Court), by submitting a ticket through the Planet FM system. Every effort must be made to prevent access to faulty electrical equipment.

16. Food Safety, Catering and Kitchens.

- 16.1 The food handling areas of the School have been registered with the local food authority. Sodexo are contracted to provide catering services and are responsible for the health and safety of food on site. Staff who do not work for Sodexo are, therefore, not to enter the kitchen space unless invited to do so by Sodexo and must observe relevant hygiene requirements in force at the time.
- 16.2 Staff who may be involved in handling food, whether as part of work in the EYFS setting, to support a School fundraising event or for any other reason where food is provided to pupils, staff or members of the public, must complete appropriate Food Hygiene training which must be refreshed at regular intervals. Further advice is available on request from the Director of Operations and Ripley Court Bursar.

17. Lifting and Manual Handling

- 17.1 The risk of injury due to the lifting of heavy loads is recognised by the School and all reasonable measures will be taken as necessary to reduce such risks. This includes basic training in manual handling for all staff. It is the responsibility of staff to assess any ad-hoc risks and to seek advice or help if they are unsure as to whether they can perform a task. Staff regularly involved in work where manual handling is necessary, receive more detailed training and must consult the relevant risk assessment for the task to be undertaken before commencing work.

18. Cleaning

- 18.1 The following will apply:
- Glass and other sharp waste materials will be disposed of in a way which will ensure that no sharp waste materials can cause injury to pupils, staff or contractors.
 - Notices will be placed to alert people to the existence of wet floors and unsafe temporary arrangements.
 - All cleaning chemicals will be stored safely and securely and where children will not have access following COSHH guidelines.

- Any issues regarding cleaning must be reported to the Director of Operations and Ripley Court Bursar (Ripley Court) or to the Cleaning Manager (Reed's).

18.2 Ripley Court Only - It is the duty of the cleaning contractors to ensure compliance with the above and with relevant legislation.

19. Review

- 19.1 The Board of Governors will review this policy periodically and update, modify or amend it, so far as is reasonably practicable, so that it protects the health, safety and welfare of staff, pupils and others who use the premises.
- 19.2 The Board of Governors, along with the Executive Headmaster (Reed's)/Headmaster (Ripley Court) along with the Director of Operations and Ripley Court Bursar will monitor the effectiveness of this policy. This monitoring will include appropriate inspections, reports and tours, as well as by assigning a Governor to be responsible for Health & Safety at both Schools.
- 19.3 Following review and/or monitoring activities, the policy will be revised if necessary so that the policy continues to meet its purpose.
- 19.4 The Executive Headmaster/Headmaster (Ripley Court) and the Director of Operations and Ripley Court Bursar will keep the Governing Body generally informed, and up to date, with matters concerning health and safety at both Schools.

Complied by: Director of Operations	Reviewed: Spring Term 2026
Approved by: RS and RCS Governing Body	Next Review: Spring Term 2027

Revision History Table

Revision Number	Section/Paragraph number	Amendments
Spring 2026	1.5	Previously paragraph 1.9
	1.7	Added 'on request' to end of final sentence
	3.2.2	Change 'He/She' to 'The Executive Headmaster'
	3.4.1 (v)	Add 'the details'
	3.4.2	Update role title from 'Head of Security, Caretaking and Transport' to 'Site Operations Manager'
	3.7.1 iii)	Add 'where a parent/guardian is unavailable to do so'

		Remove 'Estates Project Manager and the'
	3.9.1	Replace 'Senior Matron' with ' Medical Centre Manager' and add 'Head of Art'
	3.10.1	Add 'Lone Working Policy'
	4.1 j)	Add 'Staff Mental Health and Wellbeing Policy'
	4.1 q)	Add 'Lone Working Policy'
	5.10	Add 'high risk' in first sentence. Add final sentence.
	8.2	4 th bullet point – add final sentence. 5 th & 9 th bullet points – new.
	9.1	Update specification number and add 'DT Department'
	13.3	Remove 'latex (or similar....)' and replace with 'Non-allergenic.....'
	13.4	Rewritten
	14.1	Previous paragraph deleted.
	32.1	Section title updated
	35 & 36	Minor clarification
	37.2	Delete 'where the school occupies premises'
	40.2	Updated organisation chart to remove Estates Project Manager.
	Appendix 3.2	

APPENDIX 1 – RIDDOR Reporting

- 20.** The Health and Safety Executive (HSE) requires the School to report certain deaths, injuries, incapacitations or near misses to them. Not all accidents need to be reported however, and any report to the HSE must only be made by the Director of Operations & Ripley Court Bursar or Bursar and Secretary to the Governors (Reed's). For the purposes of complying with RIDDOR, these are considered to be 'the responsible persons'.
- 21.** The Responsible Person will need to consider a number of factors before submitting any report and should seek guidance from the following documents:
- For staff (workers):- Reportable incidents – RIDDOR – HSE
 - For pupils:- Incident reporting in schools (accidents, diseases and dangerous occurrences) EDIS1 (hse.gov.uk)

APPENDIX 2 – Working at Height

22. General Statement

- 22.1 The School recognises that there may be an increased risk to the health and safety of its employees when working at height. The aim of this appendix is to ensure, so far as is reasonably practicable, the health, safety and welfare of School employees while they are at work in relation to activities that involve working at height and to comply with all relevant legislation. The principles of this also apply to where pupils may be carrying out activities at height.

23. Definition

- 23.1 Working at height is defined by the HSE as follows: ‘work at height means work in any place where, if precautions were not taken, a person could fall a distance liable to cause personal injury’. A person is working at height if they:

- Work above ground/floor level
- Could fall from an edge, through an opening or fragile surface or
- Could fall from ground level into an opening in a floor or a hole in the ground

- 23.2 Work at height does not include a slip or a trip on the level, as a fall from height has to involve a fall from one level to a lower level, nor does it include walking up and down a permanent staircase in a building’ (<http://www.hse.gov.uk/work-at-height/faqs.htm>).

24. Legal duty

- 24.1 The School’s duty to assess and control risks from working at height is governed by the Health and Safety at Work Act 1974 (HSWA). S.2 requires the School to ensure, so far as is reasonably practicable, the health, safety and welfare of its employees. Similar duties are owed to other persons under S.3 of the HSWA. This will be achieved by carrying out risk assessments in accordance with the Management of Health and Safety at Work Regulations 1999 (as amended). Working at Height is specifically covered by The Work at Height Regulations 2005.

25. Risk Assessment

- 25.1 Risk assessments will be undertaken for work at height. Once all job roles involving working at height have been identified, the following factors will be considered:

Content of Risk Assessment

- Justification for working at height
- Selection, use and inspection of work equipment
- Competence of personnel
- Description and duration of work
- Access and egress
- Weather conditions
- Where appropriate, fall protection
- Securing the work area

- Working on roofs – a separate risk assessment is required for working on roofs which specifically addresses the need for the work and the precise safety arrangements.

26. Contractors

- 26.1 Prior to any work at height commencing, the contractor will be made aware of this policy. The contractor will be expected to provide a sufficient method statement and risk assessment identifying the risks and control measures for working at height to be undertaken by them.
- 26.2 The competence of each person working at height will be assessed by the contractor and included in the risk assessment.
- 26.3 Should a member of staff have any concerns about working at height operations being undertaken by contractors, they should promptly bring this to the attention of the Director of Operations & RCS Bursar, or to the Facilities Manager.
- 26.4 See also Managing Contractors Policy.

27. Control Measures

- 27.1 To ensure that any activities which involve working at height are undertaken safely staff should:
- Avoid working at height where possible;
 - Use work equipment or other measures to prevent falls where working at height is unavoidable;
 - Use work equipment or other measures to minimise the distance and consequences of a fall, should one occur.
- 27.2 In order to manage the risks identified, the following control measures are in place:
- Only staff who are appropriately trained are permitted to work at height
 - Health & Safety induction and annual health & safety training
 - Ladder tag system
 - Working at Height Risk Assessment
 - Maintenance and inspection – ladder tag system; Mobile Elevated Work Platforms and scaffold towers will be checked, inspected and maintained in accordance with the manufacturer, hirer or supplier requirements and the School's Tower Usage and Working from a Scaffold Platform risk assessment.
 - Pupils – where working at height in an area where there are pupils is unavoidable, suitable arrangements will be made including cordoning off the work area to reflect the higher duty of care required for young persons.

28. Training

- 28.1 Where necessary, anyone required to work at height will be fully trained in the safe working practices to be adopted in order to carry out their tasks safely. This will apply to employees and other workers where applicable, such as agency staff and contractors. Staff who do not have the appropriate training are not permitted to work at height.

29. Line Manager responsibility

- 29.1 It is the responsibility of individual line managers to monitor the tasks being carried out by their staff.

30. Employee and contractor responsibility

- 30.1 Employees are expected to co-operate fully with any instructions given by their managers or other senior staff. Employees and contractors are expected to follow the School's safe systems of work and any associated policies and procedures. Failure to do so may result in disciplinary proceedings. Contractors failing to adhere to School policies and procedures and/or appropriate legislation may be barred from working for the School.
- 30.2 Appendix 2.1 provides examples of working at height, associated hazards and good practice.

Appendix 2.1: Examples of working at height, associated hazards and good practice

Action	Hazard	Control
Putting up displays	• Wrong equipment, eg table, desk, chair, gives way when person stands on it • Person over-reaches causing ladder to topple over • Pupil knocks into ladder causing it to topple over • Person drops display parts onto someone	• Consider pulley system • Consider room layout including access to displays • Staff must use appropriate tools and equipment for the task in hand, eg low steps, kick stool, step ladder with handrails. Climbing on chairs/tables/desks etc is not permitted • Safety arrangements shared with staff (eg at staff meetings) and recorded • Working at height equipment, such as step ladders etc, must only be used by staff trained in their use and following the School's risk assessments • Appropriate footwear must be worn • Carry out task when pupils are not in the area or on site
Placing or retrieving items stored above head height	• Person knocked on head by falling items when replacing or removing something from high shelf • Shelf collapses causing items to fall on person • Use of wrong access equipment as above	• Adopt a 'heavy box, low shelf' policy • Review storage so that frequently used items are easily accessible • Loose unsecured items must not be stored at height • Use correct equipment for the task, as above
Opening and closing windows	• Person falls off ledge whilst opening/closing window • Pupil falls from unprotected window • Poorly maintained window falls out of frame, hitting someone below	• Use long handled poles or mechanical openers • Fit window opening limiters above ground floor • Inspect and maintain windows and doors – staff should report any issues to the estates team
Drama lessons/plays	• Pupil changing lights falls from mobile tower scaffold • Item falls from gantry onto audience • Stage light falls during adjustment and hits someone • Someone climbs up outside of tower scaffold which topples over causing an injury • Scaffold collapses due to unsafe set up • Person falls through open trap door • Fall from stage	• Only trained people should change stage lights • Consider lighting rigs which can be lowered to ground level • Staff and volunteers should be trained in safe use of access equipment and hazard recognition and a record kept • Drama department has a risk assessment covering safe arrangements for drama related activities • Access equipment is suitable for purpose and checked before use and there are regular documented checks • Where someone has a pre-existing medical condition or some other condition which may affect their ability to use any equipment, a separate risk assessment is in place • Create an exclusion zone below areas as required for safety

Physical Education lessons	• Injury to a person when retrieving items from high structures • Ceiling bolt for trampoline harness is worn through and a pupil falls to the ground • Pupil falls from a fixed wall rope which has not been maintained properly • Vaulting horse used as a platform to reach something • Person falls off climbing wall when inexperienced 'buddy' fails to stop fall • Pupils gain unauthorised access to high level gym equipment	• There are appropriate PE risk assessments in place which PE staff are required to follow • Competent staff supervise activities and act in accordance with BAALPE and national governing body guidance • Use pole to reach items at height • Gym is kept locked when staff are not in attendance • Provide equipment which is suitable to the users to enable safe access to high areas eg mobile access tower, mobile elevated working platform • All access equipment and PE equipment is suitable for purpose and checked before use • Regular documented safety checks • Equipment is only used by those competent in its safe use • Where someone has a pre-existing medical condition or some other condition which may affect their ability to use any equipment, a separate risk assessment is in place • Items trapped at high level are retrieved periodically during planned maintenance • PE code of conduct in the gym • PE risk assessments in place • All fixed and movable equipment is subject to regular recorded inspection and maintenance
Caretaking duties	• Over-reaching causes fall from a ladder which is not footed or tied during use • Caretaker falls off edge of flat roof when retrieving ball • Caretaker falls through roof void when walking on joists • Caretaker drops a hammer whilst fixing a loose gutter hitting a person below • Caretaker falls through fragile roof • Stepladder rung breaks • Caretaker electrocuted repairing window from an aluminium ladder when coming into contact with overhead power cable	• Detailed risk assessment in place prior to any work at height • Staff instructed not to climb onto furniture or any inappropriate fixed or mobile structures • Area checked for environmental hazards, eg (overhead) cables, uneven surfaces, wet ground • Safety arrangements discussed and agreed • Suitable equipment used • Consider hiring suitable equipment for specific jobs, eg mobile elevated work platform, with staff trained in use • Regular documented checks take place to ensure safe working condition of equipment and tools • Consider use of fall arrest systems depending on nature of task, equipment and duration • Where someone has a pre-existing medical condition or some other condition which may affect their ability to use any equipment, a separate risk assessment is in place • Adequate signage is in place to warn of hazards • Work area is cordoned off • Work is scheduled to take place when others are not in the immediate area • Director of Estates and Facilities and Head of Caretaking are aware of site specific risks, including fragile roofs • Fragile roof areas are clearly labelled

		• Access equipment is removed and secured when not in use to prevent unauthorised use • Appropriate footwear is worn • Accompanying tools and equipment carried by person are in tool belts or secured appropriately • Items are lifted using appropriate equipment (eg pulleys) and appropriate safe systems of work • Battery powered tools used when working at height • If working on a roof, specific risk assessment for activity to be in place including maintaining a safe distance from the roof edge
Building work and repairs	• Person falls from a ladder which is not secured • Person gains access to scaffold and falls • Items fall from roof repair work onto person below • Incorrectly assembled scaffold collapses, injuring contractors, staff and pupils • Contractor seriously or fatally injured due to fall from roof • Contractor electrocuted when working on a ladder and inadvertently damaging overhead cables • Hot bitumen spills from roof onto person below during roof repair work • Contractor falls through fragile roof • Contractor over-balances on ceiling joist and falls through roof	• Management of Contractors policy in place including assessment of contractor's competence • Contractor's work planned outside of school hours wherever possible • School to check contractor method statement to ensure appropriate arrangements are in place for safety including PPE, fall arrest systems and how the job will be undertaken • Issue site-specific guidance including location of fragile roofs, overhead cables and other site hazards to contractor and require signature for receipt of information • School to put in place arrangements for communication, site access, safe segregation, signage, security and other related issues • Director of Estates and Facilities to observe safe working practices of contractor • Communicate any changes in safety arrangements to school staff eg changes to access routes • School to stop any works it feels are unsafe or inappropriate • School to seek further advice from technical experts where there are concerns regarding contractor safety issues.

APPENDIX 3 – Legionella, Water Systems Safety & Management Plan

31. Introduction

31.1 Scope

30.1.1. This plan covers the management and control of legionella and other contaminants in water systems at both Reed's School and Ripley Court School premises (hereinafter referred to as 'the School'), both academic and domestic.

31.2 Guidance Note

30.2.1. Legionellosis is the term used to describe the group of infections caused by legionella bacteria, whether they cause pneumonia or non-pneumonic illness. The species *Legionella pneumonia* presents the most serious hazard to health and is mainly, but not solely, the cause of Legionnaires' disease.

30.2.2. *Legionella* bacteria are found naturally in water sources. They can multiply in domestic water systems given the right conditions of temperature and nutrients. Inhalation or aspiration of legionella will also counter the risks associated with other contaminants.

30.2.3. Legionnaires' disease is a form of pneumonia that can have serious effects and is fatal in approximately 12% of reported cases. It is similar in its early stages to influenza: the patients suffer high body temperature, fever and chills, general malaise and muscle pain. A dry unproductive cough then develops and difficulty in breathing, which can become severe. Approximately half of those infected become confused and delirious while a lesser number suffer vomiting and diarrhoea. Incubation from the time of exposure to the onset of symptoms is usually three to six days but can be as short as two or as long as ten.

32. Policy Statement

32.1 As owners and managers of property, the School has a duty of care to staff, pupils and visitors so they can use the relevant buildings and facilities safely, including safe from risks associated with *Legionella* bacteria and other contaminants.

32.2 The School is wholly committed to its statutory and moral obligation to comply with the requirements of:

- Workplace (Health, Safety & Welfare) Regulations 1992 (as amended)
- Control of Substances Hazardous to Health Regulations 2002 (COSHH) and Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR)
- The Water Supply (Water Fittings) Regulations 1999 and the Notification of Cooling Towers and Evaporative Condensers Regulations 1992

- The HSE's Approved Code of Practice and Guidance L8 "Legionnaires' disease: the control of Legionella bacteria in water systems"
- The HSE's Legionnaires' disease: Technical Guidance HSG 274. Parts 1, 2 & 3 the control of legionella bacteria in evaporative cooling systems, hot and cold water systems and other risk systems
- British Standard 8580-1 : 2019 Water quality – Risk assessments for Legionella control – Code of Practice

32.3 The School will make appropriate arrangements for the effective planning, organisation, control, monitoring and review of all measures put in place to ensure that adequate water safety measures exist within all premises managed by the School. The School will also require its contractors to abide by relevant legislation and technical guidance, as well as the School's other Health and Safety procedures.

32.4 The management of legionellosis risk will be a continual commitment by the School and will involve regular management review.

33. Key roles and responsibilities

Role	Name & Position	Contact Information
The Duty Holder (DH)	The Board of Governors	Via The Secretary to the Governors T: 01932 868680
Lead Senior Manager for Health and Safety	Lucy Hurford Reed's Bursar	T: 01932 868680 E: lhurford@reeds.surrey.sch.uk
Responsible Person (RP)	Jason McKinlay Operations Director & RCS Bursar	T: 01932 869044 E: jmckinlay@reeds.surrey.sch.uk
Deputy Responsible Person (DRP)	Adam Mason Facilities Manager	T: 01932 589497 E: amason@reeds.surrey.sch.uk
Water Hygiene Consultants	Healthy Buildings International	T: 01889 889999 E: ubfi@hbi.co.uk

33.1 Responsibilities of key personnel – see Appendix 3.1

33.2 Responsible parties' organisation chart – see Appendix 3.2

34. Risk Assessment

34.1 General Approach to Risk Assessment

33.1.1. The School is committed to minimising the risks associated with legionella bacteria. In accordance with the requirements of the Approved Code of Practice L8, the School will identify and assess the risks of legionellosis. The Responsible Person (RP) will arrange for assessments to be undertaken by a competent person to identify and evaluate the risks to which relevant persons may be exposed. Any external consultant shall be suitably qualified and experienced, with a minimum of registration to the LCA Code of Conduct and AKAS accreditation to ISO 17020 for such works. The legionella risk

assessment shall be carried out in accordance with BS 8580-1: 2019 and shall include consideration of the following:

- Contamination – the likelihood of legionella contamination at source;
- Amplification – the conditions prevailing to take account of the likelihood of legionella proliferating;
- Transmission – aerosol generation, dissemination and exposure;
- Exposure – the risk that water droplets will be inhaled; and
- Host Susceptibility – the likely susceptibility of those exposed.

33.1.2. Schematic diagrams will be produced¹, with the exception of the domestic houses where a water services schematic is not deemed necessary. Risk assessments will be reviewed regularly at intervals as determined by the risk assessment or whenever the situation may have changed e.g. changes to the water systems, changes to the use of the building, results indicate that the control measures are not effective or a case of legionellosis. The assessments must contain direction as to how the risk is to be eliminated or, where this is not possible, how the risk is to be controlled. The School will carry out actions to address risks identified in the risk assessment as set out below and will keep an electronic record of the Risk Assessment.

35. Legionella Risk Management

35.1 Removing or Reducing the Risk

34.1.1. When the risk assessment identifies a risk that is significant, wherever practicable the School will remove the potential source of risk.

35.2 Controlling the Risk

34.1.2. Where it is not reasonably practicable to eliminate the risk, a written scheme of precautions shall be devised and implemented to control that risk, as far as is reasonably practicable, in accordance with the Approved Code of Practice L8.

35.3 Management of the Risk

34.1.3. Where the risk assessment identifies a risk which is negligible and likely to remain so, that risk assessment shall be reviewed periodically as determined by the risk assessment. Where the risk assessment identifies a risk which is significant and can be eliminated, that risk assessment shall be reviewed once the risk has been removed. Where the risk assessment identifies a risk which is significant and can be controlled, that risk assessment shall be reviewed once the controls have been implemented or whenever there is a change which may affect the risk.

¹ Due to the age of the Manor House, which forms part of Ripley Court School, it is not possible to trace all water services through the building without damaging the historic fabric of the building.

34.1.4. Where elimination of a risk is deemed impracticable for reasons of cost, that shall be reviewed whenever significant expenditure (such as renovation) is considered. Risk assessments where there is no reason to suppose there has been any relevant change shall be reviewed on a frequency as determined by the risk assessment, but not less than every two years. There are no sites that fulfil all the low risk criteria as defined in ACop L8 2013.

35.4 Record Keeping

34.1.5. The School will keep appropriate records to confirm that the risk assessment, elimination or control of the risk has been effected fully by competent individuals.

36. Legionella System of Control

36.1 As a general principle, the School adopts a 'temperature control' based regime to manage water systems. A System of Control is prepared for each site and is managed as follows:

37. Information

37.1 The primary method of dissemination of information employed by the School is via the Facilities Management team who maintain both written and electronic records. These records contain the risk assessments, subsequent reviews, schematics and details of any remedial actions and audits. Appropriate access to these records will be given to relevant employees and to other organisations/persons to satisfy legal requirements and as deemed necessary. Site records contain the Legionella Written Control Scheme, to include all information as required by Appendix 2.2 of the HSG 274 Part 2.

37.2 The regular inspection and monitoring advised in HSG 274 Part 2 will be undertaken by the Water Hygiene contractor and results noted in the written records. Weekly flushing of rarely used outlets will be undertaken as directed by the DRP atSchool. A written record of these will also be kept. The on-site System of Control will be regularly audited by the RP to ensure compliance and adequate action management, to encourage good practice and, where necessary, to improve the performance of staff and contractors.

37.3 Water monitoring in domestic properties is the responsibility of the occupier. All residents of domestic properties will be notified of the risks of exposure to legionella and the measures they can take to reduce the risk, such as cleaning of showers and maintaining stored water at 60 degrees Celsius. The residents will be provided with information periodically informing them of the risks; the self-contained domestic houses will not be included in the water monitoring regime. (Properties such as flats which are supplied from the water systems of the academic buildings will be included in monitoring regime).

37.4 Water temperatures in the EYFS setting are subject to lower temperatures than may be found in other parts of the School in accordance with specific regulations for EYFS settings.

38. Action Management

- 38.1 The RP ensures as far as reasonably practicable that the DRP reviews any actions arising from either the risk assessment or monitoring on a regular basis. Prioritisation of remedial action is determined at this review with implementation organised in liaison with the Water Hygiene Contractor.

39. Instruction and Training

- 39.1 The School will source a preferred supplier of Legionella awareness training and provide this training to all employees who require it. There will be regular reviews and refresher training will be undertaken as required.
- 39.2 All staff responsible for managing contracts relating to legionella management will receive the appropriate level of training commensurate with their level of responsibility. This will be audited by the RP and training logged with the Compliance Manager.

40. Co-operation & Co-ordination

- 40.1 The School recognises the need for adequate co-operation and co-ordination between all parties or persons who occupy premises.
- 40.2 The RP will provide information to other 'responsible persons' who occupy the premises in buildings, in order to notify them of significant risks identified during the Legionella Risk Assessment which may affect the safety of its employees and their families.
- 40.3 The information provided to the other responsible person(s) will include information on the measures that will be taken in order to control or reduce those risks.

41. Notification of Employees and Other Parties

- 41.1 The RP shall provide relevant employees with clear and relevant information on the risks to them identified by the Legionella Risk Assessment. This will include specific information about the measures that have been taken to prevent or control the risk from the water systems on site.
- 41.2 The RP shall provide relevant non-employees (i.e. temporary staff or contract workers) with information about the measures that have been taken to prevent or control the risk from the water systems on site.

42. Design, Installation, Commissioning & Handover

- 42.1 The RP shall ensure that the design of new buildings and their water systems is controlled. The design and installation of the cold and hot water services, and associated plant and equipment, in new, upgraded, or refurbished premises shall comply with current regulations and standards.

43. Contingency Plans

- 43.1 **Systems operating outside control limits**

43.1.1. Where systems are found to be operating outside recommended control limits the Water Hygiene Contractor or Legionella Risk Assessor will inform the RP. The RP will attend to the fault on a timescale appropriate to the level of risk related to the nature of the fault and the occupancy, use and service function of the premises.

43.1.2. In consultation with the Water Hygiene Advisor, where there is a fault which represents a significant failure in the measures designed to control legionella bacteria, the water system should be sampled for the presence of legionella bacteria.

43.2 Legionella positive sample results

43.2.1. In the event of a positive legionella sample result (i.e. Legionella bacteria detected) the RP will devise a plan for immediate remedial action, drawing on competent assistance to do so. The positive sample will be followed up by re-sampling the affected system(s), at a frequency appropriate to the level of risks, until the system is deemed to be 'under control'.

43.3 Suspected or confirmed cases of legionellosis

43.3.1. In the event of a suspected or confirmed case of legionellosis the RP shall be informed immediately. They should then follow the advice available from the Health & Safety Executive.

43.3.2. In addition, under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR), the RP must report any cases of legionellosis in an employee who has worked on hot and cold water systems that are likely to be contaminated with legionella.

43.4 Building Occupancy & Closure

43.4.1. The RP shall have procedures for the management of water systems in the following circumstances:

- New buildings prior to occupation
- Temporarily unoccupied buildings
- Indefinitely unoccupied/closed buildings
- Reoccupation of indefinitely closed buildings

43.4.2. In the absence of any written procedure, then for all the above circumstances, all water services will be thoroughly flushed weekly as directed by the DRP or Facilities Manager, as appropriate. The information will be recorded by the DRP/Facilities Manager and audited by the RP.

43.5 Legionella Policy & Water Safety Management Plan Review

43.5.1. This document will be reviewed at least annually to assess:

- Effectiveness.
- Impact of changes in legionella and other health and safety legislation

- Lessons to be learnt from significant incidents.
- Impact of change of personnel, introduction of new roles or corporate restructuring
- Changes in approved or consultants.

43.5.2. The review will be carried out:

- Following an outbreak.
- Following a change in the ACoP L8 and guidance.
- If this document is no longer deemed to be adequate.

44. Action in the event of Legionnaires' Disease

44.1 In the event of either an incident or outbreak of Legionnaires' disease, the RP will refer to detailed guidance available from the HSE and other relevant parties.

Appendix 3.1: Key roles and responsibilities

45. The Duty Holder

- 45.1 The Duty Holder, acting as the employer on behalf of Reed's School, is the Board of Governors. The Duty Holder has a responsibility to support this policy by providing appropriate resources including an adequate budget for the provision of suitable and sufficient equipment, personnel, time and training.

46. Responsible Person

- 46.1 The Responsible Person (RP) is the Operations Director & RCS Bursar. The RP has responsibility for overseeing this policy and plan; for keeping records to confirm that this policy and associated procedures have been implemented; for checking that maintenance visits take place on a regular and systematic basis and reporting any incidents of Legionnaires' Disease under RIDDOR .

- 46.2 In discharging these responsibilities, the RP will:

- Ensure as far as reasonably practicable, that the requirements of the HSE's Approved Code of Practice & Guidance "Legionnaires' Disease, The Control of Legionella Bacteria in Water Systems", L8, or the general duties conferred by the Health & Safety at Work etc Act 1974 and the various regulations made thereunder in relation to the prevention and control of water related risks, are addressed
- Commission Legionella Risk Assessments and subsequent risk reviews and publish to relevant staff
- Maintain an appropriate water systems risk register and publish this to relevant staff.
- Implement improvements identified by the Legionella Risk Assessments.
- Implement the monitoring and maintenance aspect of the water systems management safety plan.
- Ensure, as far as reasonably practicable, adequate systems of control.
- Ensure, as far as reasonably practicable, that no new water systems are installed, no physical alterations made, or change of use allowed in respect to existing water systems within any premises without prior consultation with the Bursar.
- Review regulatory compliance for his/her area of responsibility on a regular basis and notify the Reed's Bursar of any outstanding/new/emerging risk.
- Coordinate all water safety matters and report progress and regulatory compliance to the Bursar on an appropriate and agreed frequency.
- Ensure, as far as reasonably practicable, that an adequate number of employees have received basic legionella awareness training and task

specific instruction to enable routine control measures to be competently executed (where required).

- Check that the competency of external consultants and contractors is assessed prior to engaging their services and that evidence of these findings is recorded.
- Ensure, as far as reasonably practicable, that the duties described under the Deputy Responsible Person (DRP) are being carried out by the DRP and other persons nominated to support the DRP.

47. Deputy Responsible Person (DRP)

47.1 The RP, shall nominate a member of estates staff to be responsible on their behalf for fully implementing their nominated duties. The nominated office shall be designated the Deputy Responsible Person (DRP), whose duties are:

- Store the site records in a safe but readily accessible location.
- To report to the RP for remedial action where water systems are found to be operating outside control limits or if there is any other cause for concern and to implement corrective remedial actions. (Examples of cause for concern would include reports of cold hot water, warm cold water, unpleasant odours, distaste, discolouration, foreign objects, excessively hot water, disused water services, reduced building occupancy etc.)
- To record and report the occurrence of water safety incidents to the RP. (Eg. incidents of scalding, suspected cases of legionellosis, reports of illness in respect of drinking water supplies).
- To arrange and/or undertake routine flushing of intermittently or rarely used water services at a frequency appropriate to the level of risk related to the occupancy, use and service function of the premises or when required to do so as instructed by the RP.
- To arrange and/or undertake any other water safety management tasks when required to do so as instructed by the RP. The DRP shall only be requested to undertake tasks which they are deemed competent to arrange and/or undertake.
- To liaise with the RP, the Water Hygiene Advisor, sub-contracted companies and other relevant bodies who have mandatory or advisory water safety precaution responsibilities.
- To be aware of changes in site population and/or site use which have potential to affect the validity of the Legionella Risk Assessment and the effectiveness of the water systems safety management plan and to report such changes to the RP.
- To notify other responsible persons who share premises with the School of significant risks identified by the Legionella Risk Assessments

which may affect the safety of their employees so that they can take action to control or reduce their risks.

48. Competent Assistance (Water Hygiene Advisor)

- 48.1 Competent Assistance will be sought in instances where there is insufficient knowledge and/or resources to discharge statutory duties or otherwise effectively manage the risks.
- 48.2 The RP is responsible for taking reasonable steps to ensure as far as reasonably practicable the competency of external service providers prior to engagement.
- 48.3 Competent assistants will be instructed to provide relevant, accurate and up-to-date information within their field of expertise to facilitate support and control, as instructed by the RP. For example:
- To carry out audits of water safety measures & associated records to periodically review implementation of the water systems' safety management plan;
 - To attend to reports of water safety concerns and water safety incidents to ensure that procedures are being adhered to and that procedures employed are effective.
 - To consult and cooperate with relevant bodies who have mandatory or advisory water safety precaution responsibilities.
 - To undertake water hygiene risk assessment surveys and identify, evaluate and report the risks presented by the water systems on each site.
 - To devise control measures for preventing or controlling the risks identified.
 - Where required, to oversee and manage the monitoring and planned maintenance of the physical elements of the water systems safety management plan and to report all items of day to day maintenance to the DRP.
 - To ensure completion of the monitoring and maintenance aspect of the water systems management safety plan.
 - To be responsible for the training, competency, coordination and direction of all operatives nominated to undertake specific duties in the water systems safety management plan.
 - To be responsible for the completion of water hygiene records in relation to their areas of responsibility.

49. Lead Senior Manager for Health and Safety

- 49.1 The Lead Senior Manager with responsibility for Health and Safety (Reed's Bursar) is responsible for periodically auditing compliance with Water Safety Policy and, in conjunction with the RP, for investigating and reporting to the Finance, Risk &

Estates Committee any alleged incident of Legionella outbreak and for reporting incidents under RIDDOR where appropriate.

Appendix 3.2: Responsible Parties – Organisation Chart

