

## Introduction

At Brook Learning Trust we bring together our unique academies in our belief in the power of education to change lives and communities. It is our steadfast purpose to challenge and defy the barriers that constrain the educational progress of any child. We set high aims for aspiration and secure collective responsibility for all our children's achievements. Our work is underpinned by the values of Integrity, Respect, Courage, Optimism, Excellence and Accountability.

## 1. Purpose

Brook Learning Trust undertakes to meet fully its obligations under the Health and Safety at Work Act 1974, and as such will take all reasonable and practicable steps to prevent injury and ill health to students, staff, visitors and other users of our sites. This policy sets out the framework under which Brook Learning Trust will manage health and safety within its academies.

Health and safety will be managed by:

- Assessing and controlling risk as part of the day-to-day management of school activity
- Providing and maintaining safe, healthy and secure working conditions, training and instruction so that personnel are able to perform their various tasks safely and efficiently
- Ensuring that a constant awareness with regard to health and safety at work is maintained in respect of all activities within the school and during out-of-school activities
- Periodic review of compliance with health and safety policy by Academy Councillors
- Bi-annual review of the health and safety policy by the Audit & Risk Committee

At The Ebbsfleet Academy, health and safety in relation to building fabric and operation is the responsibility of the PFI project company, NewSchools (Swanscombe) Ltd. Compliance is overseen by Kent County Council (KCC) in conjunction with BLT's Estates Manager.

## 2. Roles and Responsibilities

The responsibilities of Trust personnel for Health and Safety are:

### Trustees

The ultimate responsibility for all aspects of health and safety at work within the Trust rests with the Board of Trustees. This obligation is discharged through the appointment of a CEO who is accountable for all health and safety matters, and through the work of the Audit and Risk Committee who review the policy and monitor compliance through receipt of periodic reports from Academy Councillors.

### CEO

The CEO is accountable to the Trustees for all health and safety matters within the Trust and its academies. The CEO delegates day to day responsibility for health and safety to the Principals. The CEO appoints the Estates Manager as the Nominated Safety Advisor for the Trust.

### Principals

Principals are responsible for the effective implementation of the policy across their academy. In carrying out this role, Principals must:

- Ensure that employees within their academy understand their responsibilities regarding health and safety through staff induction, regular briefings and training
- Ensure that risk assessments for hazardous or off-site activities are undertaken and reviewed
- Ensure, with the Estates Manager, that the requirements of any enforcement officer are complied with
- Ensure that the emergency evacuation procedures are in place and tested at least termly (three times a year)
- Ensure that there is adequate provision of first aiders at any time

- Investigate accidents on site involving academy students, staff or visitors and take the necessary action to prevent recurrence
- Ensure that a health and safety inspection is conducted at least termly (three times a year) by an Academy Councillor, with the Estates Manager
- Consult with and follow advice from the Estates Manager, as Nominated Safety Advisor

### **Estates Manager**

The Estates Manager will act as the Nominated Safety Advisor for the Trust. The Estates Manager is responsible for ensuring that the sites and buildings are maintained to the standards set out in this policy. While the site and school buildings (non PFI) fall wholly under the oversight of the Trust, PFI premises are the responsibility of the PFI project company with the Trust auditing performance and outcomes on an ongoing basis. In carrying out this role, the Estates Manager must:

- Maintain a safe working environment for students, staff and visitors that is fully compliant with all statutory regulations around buildings, facilities and sites
- Arrange formal inspections of premises, plant and equipment as required by law
- Undertake routine checks of academy equipment
- Ensure security of access to plant rooms by authorised personnel only
- Ensure a health and safety inspection is conducted at least termly (three times a year) at each academy
- Ensure that all building and site works are carried out to a high standard of safety.
- Advise Principals on all health and safety matters
- Report any health and safety concerns to the CEO
- Report any accidents in line with this policy

### **All staff**

All employees of Brook Learning Trust have a legal obligation under the Health and Safety at Work Act 1974 to take reasonable care for the health and safety of themselves and others. Each member of staff must adhere to this policy and any other health and safety advice given by their line manager, the senior team, or the Nominated Safety Officer. Each member of staff must:

- Make themselves aware of and comply with any requirements identified in a risk assessment before carrying out a hazardous activity
- Manage their workspace safely (e.g. shelves not overloaded, desk drawers closed, floors free from debris and spills, walkways and exits free from obstruction)
- Report any health and safety concerns to their line manager or Principal
- Report any defective equipment, machinery, or damage to building fabric to the site team via the academy's helpdesk
- Raise with their line manager or Principal any training needs
- Report any accidents in line with this policy

## **3. Safe environment**

### **3.1 Fire safety**

#### **Scope:**

The Trust will ensure that the risk associated with fire will be managed in compliance with The Regulatory Reform (Fire Safety) Order 2005.

#### **How we assess risk:**

Under the Regulatory Reform (Fire Safety) Order 2005, Brook Learning Trust is required to carry out a fire safety risk assessment and keep this up to date. Brook Learning Trust undertakes to conduct, on each site, a full fire risk assessment every year, and a review in intervening years. Brook Learning Trust does not directly employ staff who are qualified to carry out such risk assessments, and therefore this work is contracted out to a Fire Risk Assessment Certification Scheme (FRACS) qualified practitioner.

**How we control hazards:**The Estates Manager will

- Commission an annual inspection and maintenance of firefighting equipment (e.g. extinguishers, blankets)
- Commission an annual inspection and maintenance of the fire alarm system

The Site Manager will:

- Carry out weekly testing of the fire alarm system
- Conduct a monthly inspection of passive fire protection systems (e.g. fire doors)
- Conduct periodic checks of escape routes

The Principal will:

- Implement the recommendations from the fire risk assessment
- Conduct a full evacuation exercise once a term (three times a year)\*
- Appoint and train fire wardens\*

**How we react to events:**

In the event that fire is discovered in the building, or that the alarm sounds, staff, pupils and visitors are required to follow the fire evacuation procedure displayed in every room.

\* With the exception of these items, the operations listed under 3.1 are conducted by the PFI contractor at The Ebbsfleet Academy

**3.2 Asbestos****Scope:**

The Trust will ensure that the risk associated with asbestos will be managed in compliance with the Control of Asbestos Regulations 2012 and the Approved Code of Practice and Guidance.

**How do we assess risk:**

The Estates Manager will maintain an Asbestos Management Survey (including risk assessment) for each site. Brook Learning Trust does not directly employ staff who are qualified to undertake such risk assessments and therefore this work is contracted out to a UKAS accredited asbestos surveyor.

**How we control hazards:**

The Estates Manager will maintain an Asbestos Management Plan for each site setting out how asbestos will be managed and maintained safely on the site. The Estates Manager is the responsible person for asbestos management.

**How we react to events:**

In the event that asbestos is discovered that was not recorded on the Asbestos Management Survey, the Estates Manager will arrange to seal the area, call in an accredited expert to conduct sample testing and take the necessary steps to make the area safe.

**3.3 Water hygiene (ACoP L8)****Scope:**

The Trust will ensure that the risk associated with water hygiene will be managed in compliance with the Approved Code of Practice (ACoP) L8 for the control of legionella bacteria in water systems.

**How we assess risk:**

The Estates Manager commissions a full risk assessment on each site annually. Brook Learning Trust does not directly employ staff who are qualified to undertake such risk assessments and therefore this work is contracted out to a City & Guilds accredited risk assessor.

**How we control hazards:**

Academy Site Managers will conduct the following tests in compliance with ACOP L8 and commission any remedial works required:

- Monthly temperature checks
- Weekly flush of seldom used outlets
- Three monthly clean and descale of shower heads

The Estates Manager will commission the following tests from an accredited contractor and commission any remedial works required:

- Quarterly microbiological water sampling
- Six monthly water storage tank inspections
- Annual clean and chlorination of down services
- Annual cold water storage tank drop test

**How we react to events:**

If legionella is detected above safe levels, the affected area will be taken out of service until remedial action has been taken in compliance with ACOP L8. The area will be brought back into use only following a clear microbiology test.

All of the above operations are conducted by the PFI contractor at The Ebbsfleet Academy

**3.4 Pressure vessels and boiler systems****Scope:**

The Trust will ensure full compliance with the Pressure Systems Safety Regulations 2000 and that the risk associated with pressure systems will be managed in compliance with the Approved Code of Practice (ACOP) L122 Safety of Pressure Systems.

**How we assess risk:**

In accordance with regulation 8 of the Pressure Systems Safety Regulations 2000, The Estates Manager will commission a written scheme of examination from a competent person setting out the nature and frequency of examination for a pressure system, including all pipework, vessels, safety devices and other parts that could give rise to danger. Brook Learning Trust does not directly employ staff who are qualified to undertake such work, and therefore this is contracted out to a HVAC qualified engineer.

**How we control hazards:**

All pressure system are operated within the manufacturers specified operating limits. The Estates Manager will ensure that all pressure systems identified in the written scheme of examination are examined by a qualified engineer at the intervals specified in the scheme, and that any remedial works arising from the examination are completed promptly.

**How we react to events:**

In the event of an emergency, the fire alarm will be sounded and staff, pupils and visitors will evacuate the premises in accordance to the fire evacuation procedure.

All of the above operations are conducted by the PFI contractor at The Ebbsfleet Academy

**3.5 Gas fired appliances****Scope:**

Brook Learning Trust recognises the inherent danger of gas escapes and the need for the safe and effective operation of gas fired equipment, and will comply with the Gas Safety (Installation and Use) Regulations 1998 to ensure the safe installation, operation and maintenance of all services which use mains natural gas or locally stored "bottled" liquefied petroleum gas. This section of the policy does not cover the use of any other specialist gases, such as the use of bottled gas in science departments (please see section 4.3 below).

**How we assess risk:**

BLT do not directly employ staff who are qualified to carry out works on gas systems, and therefore all gas maintenance and installation works are carried out by appropriately qualified Gas Safe registered companies or persons. Gas Safe is the recognised scheme of the Health and Safety Executive (HSE). Before selecting a contractor, the Estates Manager will check that the Gas Safe register to ensure the company carries the appropriate commercial qualifications for the works commissioned.

**How we control hazards:**

Brook Learning Trust carries out the following statutory compliance testing on its gas appliances:

- Annual maintenance and inspection by qualified Gas Safe engineer of all gas fired boilers and calorifiers, gas supply in science labs, gas appliances in main production kitchen, domestic gas appliances in the food technology rooms
- Five yearly gas soundness and tightness test

All gas appliances are operated or supervised by an appropriately trained competent member of staff.

**How we react to events:**

In the event of a suspected gas escape or loss of supply, the standard operating procedure must be followed. This document is held in each academy's reception area.

All of the above operations are conducted by the PFI contractor at The Ebbsfleet Academy

### 3.6 Oil storage

**Scope:**

Brook Learning Trust will ensure that the risk associated with the bulk storage of petrochemicals is managed in accordance with the Oil Storage Regulations for Businesses 2016.

**How we assess risk:**

The Estates Manager will carry out a risk assessment in reference to the Oil Storage Regulations for Businesses 2016, to include the following:

- Containment of flammable liquid
- Ignition of flammable liquid or vapours
- Environmental impact of spillage

**How we control hazards?**

Oil is stored in bunded oil tanks in order to contain spillages. Tanks are inspected annually to ensure integrity. Tanks are located in a controlled access zone to minimise the risk of ignition from other sources, such as electrical or mechanical equipment, naked flames etc.

**How we react to events:**

In the event of a major spillage/discharge of heating oil or a fire involving heating oil, the incident will be managed, controlled and directed by the emergency services and or the Environment Agency.

## 4.0 Safe Working Practices

### 4.1 Maintenance of work equipment

**Scope:**

The Trust will ensure full compliance with the Electricity at Work Regulations 1989 and the Provision and Use of Work Equipment Regulations (PUWER) 1998, which require the employer to select suitable work equipment (regulation 5) and to 'ensure that work equipment is maintained in an efficient state, in efficient working order and in good repair'.

**How we assess risk:**

The Estates Manager will maintain a register of portable electrical equipment used on the site. A risk assessment is undertaken for each device. The Estates Manager is responsible for risk assessments for equipment operated by the site team and Principals are responsible for those pertaining to curriculum areas. These risk assessments will be reviewed annually.

**How we control hazards:**

Once a year the Estates Manager will commission a machine inspection from a contractor specialising in PUWER. Any remedials identified in the inspection report will be actioned by a suitably qualified engineer.

Any equipment that is brought onto the site for use by staff or students must be CE certificated and approved for use by the site team prior to use.

Once a year the Estates Manager will commission a portable electrical appliance test (PEAT) by a competent and appropriately trained PEAT inspector. Any equipment which fails will be immediately removed from use. Any remedial works will be commissioned by the Estates Manager.

All staff are responsible for visual checks on the portable appliances within their work area, and for reporting any faulty appliances to the site team.

Curriculum leaders are responsible for ensuring that all operators of machinery or equipment are properly trained in their safe operation. Curriculum leaders are supported in carrying out this responsibility by membership of CLEAPSS.

**How we react to events:**

Reaction to any event involving machinery or equipment will be entirely dictated by the nature of the event. First aid equipment including first aid kits and eye wash stations will be provided to relevant areas. If any incident is serious then the emergency services will be called to assist. All incidents, accidents and near misses will be reported in accordance with section 5 of this policy.

All of the above operations are conducted by the PFI contractor at The Ebbsfleet Academy

## 4.2 Control of substances hazardous to health

**Scope:**

Brook Learning Trust recognises that materials or substances used or created at work could harm health and will ensure compliance with the Control of Substances Hazardous to Health Regulations 2002.

**How we assess risk:**

The Estates Manager maintains a register of all hazardous substances used or produced on site. A COSHH risk assessment is undertaken for each hazardous substance. The Estates Manager is responsible for risk assessments of those substances which pertain to site maintenance, and the Principal is responsible for those pertaining to curriculum areas. These might include (but will not be limited to):

- Cleaning products
- Paint
- Dust produced during general maintenance or practical lessons
- Fumes, liquids, gels, powders, chemicals and radioactive waste produced in practical lessons
- Blood and other biohazards

**How we control hazards:**

The risk assessment will identify control measures to be put in place. These might include (but will not be limited to):

- Use a safer alternative
- Change the process to eliminate use
- Enclose the process or activity as much as possible to minimise the escape or release of the harmful substance
- Use closed transfer and handling systems and minimise handling of materials

- Extract emissions of the substance near the source
- Restrict access to those people who need to be there
- Plan the storage of materials, and use appropriate containers. Check that storage containers are correctly labelled and that incompatible materials, for example acids and caustics, are separated
- Plan the storage and disposal of waste
- Ensure appropriate protective clothing is used when handling hazardous substances
- Exposure to hazardous substances can occur during cleaning, so plan and organise the workplace so that it can be easily and effectively cleaned
- Smooth work surfaces will allow easy cleaning
- Have the right equipment and procedures to clear up spillages quickly and safely
- Clean regularly using a 'dust-free' method – vacuum, don't sweep

Curriculum leaders are responsible for ensuring that all staff and students coming into contact with hazardous substances do so in a safe and compliant manner, and that hazardous substances are stored and disposed of safely. Curriculum leaders are supported in carrying out this responsibility by membership of CLEAPSS.

#### **How we react to events;**

Our reaction to any event involving a hazardous substance will be entirely dictated by the nature of the exposure as well as the substance involved. First aid equipment including first aid kits and eye wash stations will be provided to relevant areas. If any incident is serious then the emergency services will be called to assist.

All of the above operations are conducted by the PFI contractor at The Ebbsfleet Academy for substances utilised in the provision of their services. Brook Learning Trust is responsible for these operations for substances utilised in delivering the curriculum.

### **4.3 Compressed Gases**

#### **Scope:**

Brook Learning Trust will ensure that all cylinders containing compressed gas (regardless of quantity of gas) are utilised and stored in accordance with the code of practice 44 from the British Compressed Gases Association.

#### **How we assess risk:**

The head of department will complete a risk assessment for the storage of any compressed gases on site. The risk assessment should take into consideration:

- The quantity of cylinders requiring to be stored. This should be kept to the minimum necessary.
- The hazard classification of the gases.
- The densities of gases stored.
- Fire risk, including detection, of the gases in the chosen location

#### **How we control hazards:**

All compressed gases stored on site must be appropriately labelled and/or colour coded to identify the contents of the gas cylinder.

Storage sites must have adequate signage to provide warnings and safety information, to include the following:

- No smoking
- No naked flames
- No sources of ignition
- No access for unauthorised persons
- No mobile phones or other electronic devices
- No storage of oil, grease or combustible materials

Gas cylinders must only be handled by suitably trained and authorised persons. This would normally extend to members of the site team and the science department.

Empty and unwanted cylinders should be disposed of promptly to ensure that the quantity of cylinders stored is kept to a minimum. Oxidising gases will be stored separately from inert gases and typically in areas where fire resisting structures provide 60 minute protection.

**How we react to events:**

All instances of an unintentional release of gas should be treated as an emergency incident and managed with assistance from the emergency services. If the school is evacuated, it will only be reoccupied once it has been declared safe by the incident manager.

All of the above operations are conducted by the PFI contractor at The Ebbsfleet Academy for bottled gases utilised in the provision of their services. Brook Learning Trust is responsible for these operations for bottled gases utilised in delivering the curriculum.

#### **4.4 Working at Height**

**Scope:**

Brook Learning Trust complies with the Working at Height regulation 2005.

**How we assess risk:**

The Estates Manager will undertake a risk assessment before any member of staff is permitted to work at height. In the majority of cases, working at height will be conducted by a specialist contractor, who will be required to submit risk assessments and method statements prior to commencing works.

**How we control hazards:**

Brook Learning Trust operates a permit to work system for working at height, preventing any member of staff or contractor from working at height without approval from the Estates Manager. No works will be permitted unless the Estates Manager is assured that work can be undertaken safely.

**How we react to events:**

In the event of an accident the emergency services will be called to assist. The Estates Manager will ensure that the circumstances are fully reported to the Principal and the Audit and Risk Committee, and in the case of a reportable injury the Health and Safety Executive will be informed.

All of the above operations are conducted by the PFI contractor at The Ebbsfleet Academy

#### **4.5 Confined Spaces**

**Scope:**

The safety of employees and others working in confined spaces is governed by the Confined Spaces Regulations 1997. A confined space is a place which is substantially enclosed and where serious injury can occur from hazardous substances or conditions within the space or nearby, e.g. lack of oxygen.

**How we assess risk:**

Academy Site Managers, supported by the Estates Manager, will identify and maintain a register of all confined spaces and will either prohibit access into those spaces or where this is impractical, will complete a risk assessment for each identified confined space.

**How we control hazards:**

No member of staff is authorised to enter a confined space without authorisation from the Estates Manager. Authorisation will be granted on receipt of a satisfactory risk assessment and method statement including emergency escape procedures.

**How we react to events:**

Emergency incidents involving personnel working in confined spaces will be managed with the assistance of the emergency services.



All of the above operations are conducted by the PFI contractor at The Ebbsfleet Academy

#### **4.6 Site Access and Security**

**Scope:**

Brook Learning Trust is committed to ensuring that access and egress to academy sites is safe, and that sites are secured from criminal intrusion, in compliance with the Health and Safety at Work Act 1974

**How we assess risk:**

Site access and security is reviewed annually by the Estates Manager on behalf of the Principal as part of each academy's annual management plan.

**How we control hazards:**

Academy site teams will carry out routine testing and maintenance of alarm systems. Any changes to buildings, access and egress arrangements must be properly considered by the Estates Manager and any risk managed before implementation. Consideration should be given to separating pedestrian and vehicular accesses as far as practicable.

**How we react to events:**

Reaction to any breach of site security will be dictated by the nature of the event, but could range from checking CCTV footage and reporting the incident to the police, to implementation of lockdown procedures.

All of the above operations are conducted by the PFI contractor at The Ebbsfleet Academy.

#### **4.7 First Aid**

**Scope:**

Brook Learning Trust complies with the The Health and Safety (First-Aid) Regulations 1981

**How we assess risk:**

A first aid risk assessment is maintained by each academy's first aid champion.

**How we control hazards:**

First Aid boxes are located in designated areas in the academy, clearly marked. A travelling first aid box is available for outside activities, visits and trips.

The Principal will ensure that there are sufficient numbers of trained and qualified first aiders within the academy and an on call rota. The HR department will maintain the list of first aiders.

No medication should be administered by academy staff to any student unless a written instruction is received from the parent or guardian and then it should be dispensed by a competent member of staff. Written records will be kept in all instances.

**How we react to events:**

All injuries and medical incidents to any individual whilst on the academy premises will be reported to the Principal within 24 hours of occurrence and recorded on an accident form / within the accident book. Any accident resulting in a serious injury involving ambulance attendance or referral to hospital must be reported to the Estates Manager.

All of the above operations are conducted by the PFI contractor at The Ebbsfleet Academy

#### **4.8 Lone working**

**Scope:**

Brook Learning Trust is committed to establishing a healthy and safe working environment for lone workers.

**How we assess risk:**

A risk assessment must be drawn up for any job role which requires regular lone working. The member of staff line managing the lone worker is responsible for conducting this risk assessment, and this must be done in consultation with the lone worker.

**How we control hazards:**

The control measures included within the risk assessment may include (but will not be limited to):

- amending working hours to avoid lone working
- avoiding hazardous activities during lone working hours
- making arrangements for supervision or buddying
- communication during and at the end of lone working hours
- ensuring access to first aid facilities and Standard Operating Procedures

**How we react to events:**

An emergency incident involving a lone worker should be reported to the emergency services by the worker or their buddy/supervisor.

**4.9 Hazardous activities and off-site educational visits**

All personnel that arrange school visits or out of school activities must follow the Brook Learning Trust Educational Visits Policy. This policy and its associated documentation can be found on the staff area of the network.

**5. Accident reporting, investigations and lessons learned**

Any accident, injury or near miss involving any persons on site, is to be reported to the Principal or nominated representative and entered in the accident report book, located in reception. The Principal or nominated representative is to ensure that the Estates Manager is informed of all accidents of a serious nature involving ambulance attendance or hospital referral, and any dangerous occurrences or near misses.

The Estates Manager will notify the Health and Safety Executive of any reportable incidents under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR). The Estates Manager will report any significant incidents, accidents or near misses to the Audit and Risk Committee via the termly monitoring visit reporting regime.

The Estates Manager, or the Principal’s nominated representative, will carry out an investigation into any serious incident, accident or near miss, in order to determine causation and any measures that can be taken to prevent a recurrence.

**POLICY REVIEW AND RATIFICATION**

Policy reviewed bi-annually and ratified by Audit and Risk Committee in March

This review by Estates Manager and Finance Director      March 2018

Summary of amendments to this iteration:      Complete re-write

Ratified by Audit and Risk Committee      March 2018

Next review      March 2020