



## Health and Safety Policy

**Reviewer:** Jim Onions/Andrew Hailes

**Approver:** Philip Attwell

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**Next Review:** May 2027

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'Cheltenham College' refers to Cheltenham College Senior School *and* Cheltenham College Preparatory School (including Cheltenham College Pre-Prep and Nursery School)

'College' refers to Cheltenham College Senior School

'Cheltenham Prep' refers to Cheltenham College Preparatory School

'Nursery and Pre-Prep' refers to Cheltenham College Nursery School and Pre-Prep

### Section 1 - Statement of Intent

**1.1 The Council** of Cheltenham College recognises Cheltenham College's responsibilities as defined in the Health and Safety at Work Act 1974 and subsequent health and safety legislation. Council recognises that Cheltenham College is required to provide a safe and a healthy place of work for staff, pupils, and visitors. This policy applies to the whole of Cheltenham College.

The responsibility for Health and Safety rests with Cheltenham College.

**1.2 Council** requires that Cheltenham College leadership teams and all staff, display and maintain a positive attitude to Health and Safety.

Keeping Children Safe in Education (2024) provides guidance for safeguarding. Inherent within KCSIE are principles that underpin Health and Safety, helping to engender the positive and proactive approach to the health, safety, and wellbeing that Council requires. Principally Council draws to the attention of management and staff the following two points from KCSIE that are particularly relevant.

- ☐ **All** staff have a responsibility to provide a safe environment in which children can learn.
- ☐ Staff members working with children are advised to maintain an attitude of '**it could happen here**' where safeguarding and safety is concerned.

**1.3 Council** believes that these statements underpin a safer College environment and a positive organisational culture of safety.

**1.4 College Leadership Teams** will, on behalf of the Council, take all reasonably practicable steps to ensure the health, safety, and welfare of all persons using Cheltenham College facilities and to ensure that buildings, plant and equipment are safe for their intended use, paying particular attention to:

- ☐ Provide adequate resources to maintain health and safety.
- ☐ Carry out risk assessments and a programme of review of these assessments.
- ☐ Provide and maintain systems of work that are safe and that minimise risk to health.
- ☐ Establish arrangements for the use, handling, storage and transport of articles and substances provided for use at work, which are safe and that minimise risk to health.
- ☐ Provide employees with the information, instruction, training, and supervision, as is necessary, to secure their safety and health at work and that of others who may be affected by their actions.
- ☐ Assess employee's fitness for work and carry out health surveillance, where required.
- ☐ Ensure that all machinery, plant, and equipment, is maintained in a safe condition.
- ☐ Make adequate provision and arrangements for welfare facilities at work.
- ☐ Keep the workplace safe and ensure that access and egress are safe and without risk.
- ☐ Monitor safety performance to comply with legal requirements.



Signed  
President, for and on behalf of Council

Date: 26 November 2024

## **Section 2 - Organisation and Responsibilities**

The structure and organisation for health and safety management is outlined in this section. Responsibilities are given under each heading:

### **2.1 Council**

Council has oversight of health and safety management within College.

### **2.2 The Heads and the Bursar**

The Heads and the Bursar have the responsibility for the overall management of health and safety with support from staff members as described below. They will seek to ensure that sufficient resources are available to provide, so far as is reasonably practicable, the training, information, and equipment to achieve and maintain a high standard of safety and proficiency. The Heads' responsibilities are focused on the academic, pastoral, and co-curricular elements of Cheltenham College operations, through the academic staff reporting to them; and the Bursar's responsibility is focused on premises, facilities, and work equipment, through the support and administrative staff reporting to the Bursar.

### **2.3 The Health and Safety Committee and Representatives**

The Health and Safety Committee (the Safety Committee) is Chaired by the Deputy Bursar, with workplace representatives from across Cheltenham College. The Safety Committee arrangements are stated later in this policy.

### **2.4 Health Safety and Risk Manager**

Provides advice and support on health and safety across Cheltenham College's operations and oversees the arrangements for fire safety, risk assessments, maintenance of Cheltenham College's asbestos register, accident reporting and accident investigation.

### **2.5 Estates Bursar**

The Estates Bursar has responsibility for the management of health and safety of the Estates, Grounds, and Gardens, Teams.

### **2.6 Heads of Academic, Co-Curricular, Administrative Departments and Housemasters and Housemistresses**

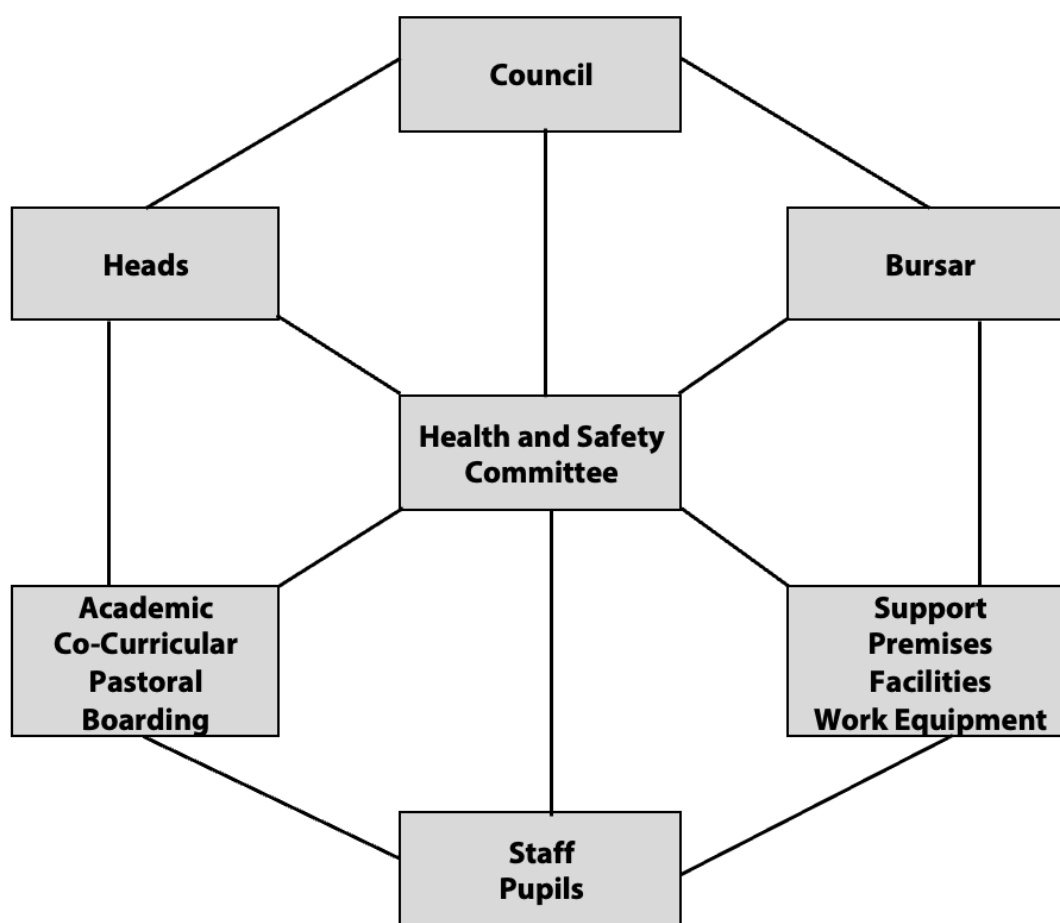
HODs & HSMs provide leadership and promote responsible attitudes towards health and safety within their department or house.

Each HOD and HSM (or Matrons where appropriate):

- ☐ Will ensure that new members of staff in their department/house are given induction training that is appropriate to their specific job. New staff will be shown the location of first aid boxes, fire exits and emergency fire equipment, and this is recorded on their induction record.
- ☐ Will ensure that they, and the staff for whom they are responsible, have read and are aware of Cheltenham College (and where appropriate, their departments') health and safety policy.
- ☐ Shall keep up to date with health and safety matters applicable to the operation of Cheltenham College, via attendance at HODs/HSMs meetings and circulation of

Health and Safety Committee minutes. Particular attention being paid to any Regulations affecting their own department/house and ensure that their staff (and pupils where applicable) receive the appropriate training and information.

- Shall report all accidents, or potentially hazardous situations, to the relevant team to rectify the situation, for example Estates, Porters or Security and notify the Health, Safety and Risk Manager and assist in investigating the situation as required.
- Will ensure that good housekeeping standards are applied and act immediately if this is not the case. This refers to levels of general cleanliness, removal of wastepaper or materials, and that spills are dealt with.
- Should report any defect, alteration or change that would affect the safety of anyone at Cheltenham College, to the Estates Department as soon as possible. Estates assess and prioritise these requests for action.
- Carry out, in consultation with the Health, Safety and Risk Manager, safety checks, emergency practice drills, audits and risk assessments.



**College Health and Safety Structure**

## **2.7 Staff**

Staff have a duty to take every reasonable care of their own safety, and the safety of others, who may be affected by their acts or omissions. They are expected to follow Cheltenham College's health and safety procedures and to report any incident or accident, which has led to damage or injury, to their HoD. Staff are reminded that they must not interfere with, or misuse any equipment provided for health, safety, or welfare purposes. Should conflicts between the requirements of health and safety and curricular priorities arise, the conflict should be reported to the HoD/line manager, who will advise or seek further advice from the Health, Safety and Risk Manager.

## **2.8 Pupils**

Staff are responsible for the health, safety and welfare of pupils and should ensure that they are not exposed to unacceptable risks. Pupils must understand that they too have a responsibility for their health and safety, and that of others in Cheltenham College. Pupils receive health and safety information and briefings during their time at Cheltenham College. Reminders specific to pupil health and safety will be provided by staff, instructors, coaches, and Housemasters /Housemistresses. Pupils are classed as visitors to Cheltenham College when reporting incidents to the HSE.

In some cases, during education (academic and co-curricular), pupils may be exposed to a degree of risk that has been assessed and there is a need to follow safe procedures, and/or to wear protective equipment in order that this risk is minimised. Pupils are to be made aware that the procedures/equipment are for their protection and must be enforced if the risk assessment requires. Pupils disregarding this advice shall not be allowed to undertake the activity in question unless they comply with the advice given.

## **2.9 External Health and Safety Consultants**

Cheltenham College may enlist the assistance of external consultants to ensure it effectively manages its health and safety responsibilities.

## **Section 3 Arrangements**

### **3.1 Health and Safety Arrangements**

This section of arrangements is not an exhaustive list but covers the main hazards and risks in the activities undertaken at Cheltenham College.

If arrangements for specific hazards or risks are not contained within this outline document, they should be included within departmental policy documents. In any case of doubt, contact the Health, Safety and Risk Manager for advice. Some arrangements have a full separate policy document, which may be found on Cheltenham College Policy Portal.

The arrangements have been written in accordance with current legislation, HSE guidance or approved codes of practice as appropriate. The following policies contain further Health and Safety guidance:

- ☐ Transport Policy (CC)
- ☐ Fire Safety Policy (CC)
- ☐ First Aid Policy (CC)
- ☐ Managing Aggressive or Concerning Behaviour from Visitors to College Policy (CC)
- ☐ Maternity Policy (CC)
- ☐ Recruitment Policy (CC) – selecting contractors
- ☐ Risk Assessment Policy (CC) – slips and trips are routinely incorporated within risk assessments
- ☐ Stress Management Policy (CC)
- ☐ Trip Management Policy, Guidance for Trip Leaders ©
- ☐ Visitor Policy (CC)
- ☐ Welfare Health and Safety Educational Trips (P)

### **3.2 Health and Safety Training and Induction**

It is the duty of Cheltenham College to provide induction, and refresher training to its employees and training for staff who have a change of role or work venue. New teaching staff will be inducted by the HR department or their own HoD/line manager. Non-teaching staff will be inducted by their HoD and will receive department specific training from their immediate supervisor dependant on job location. The HR Department will keep a record of the training given after having been signed by the employee.

### **3.3 Risk Assessment: Identification of Hazards: specific risk assessments**

In accordance with Cheltenham College Risk Assessment Policy, College will seek to ensure that:

- ☐ Suitable and sufficient risk assessments are undertaken for activities where there is likely to be significant risk.
- ☐ Measures are implemented to control risk so far as reasonably practicable.
- ☐ Those affected by school activities have received suitable information on what to do.
- ☐ Risk assessments are recorded and reviewed when appropriate.

### **3.4 Guidance**

The Heads and Bursar will seek to ensure the implementation of this policy within their respective areas of focus.

This guidance is applicable to general risk assessment. Where more detailed guidance is

required, e.g. asbestos, fire, water quality and hazardous substances, separate assessments are undertaken.

Staff receive guidance on risk assessment as part of their induction from their Head of Department or line manager. An online Risk Assessment training package is available and advice on risk assessment can be sought from the Health, Safety and Risk Manager

A template risk assessment form is available on the Digital Zone - Health and Safety Portal. College adopts the CLEAPSS Advisory Service model risk assessments for lessons in Science.

Risk assessments will consider:

- ☐ Hazard - something with the potential to cause harm
- ☐ Risk - an evaluation of the likelihood of the hazard causing harm
- ☐ Risk rating - assessment of the severity of the outcome of an event
- ☐ Control measures - physical measures and procedures to mitigate the risk

The risk assessment process will consist of the following steps:

- ☐ What is the hazard/risk?
- ☐ Who might be harmed
- ☐ What is the risk level?
- ☐ What are you currently doing to reduce the risk/hazard to an acceptable level (Control measures)
- ☐ What additional measures are required to control the hazard/risk

The Health, Safety and Risk Manager will be responsible for maintaining the risk assessment register.

Risk assessments will be reviewed:

- ☐ When there are changes to the activity
- ☐ After a near miss or accident
- ☐ When there are changes to the type of people involved in the activity
- ☐ When there are changes in good practice
- ☐ When there are legislative changes
- ☐ Annually if for no other reason

### **3.5 Summoning Ambulance Support**

In the event of a serious accident, involving physical injury, the ambulance service should be called without delay using the nearest telephone.

- ☐ Dial 999;
- ☐ An ambulance called onto Cheltenham College premises should be met and guided to the scene.

South West Ambulance use the 'What Three Words' system to help them locate incidents. Callers for an ambulance can use What Three Words to help pinpoint their location to help the ambulance crew to find them.

Minor injuries should be treated by first aid initially, but an ambulance must be called in any case of doubt. The Health Centre is available to treat pupil injuries and to follow up on recovery.

### **3.6 Accident Reporting**

There is a legal requirement to report accidents. Cheltenham College uses an online accident form which is available on the Digital Zone. Guidance for filling in the accident report form is available on the Health and Safety Portal.

The member of staff who witnesses, or first encounters the incident should complete the accident report form. The responsibility for this does not lie with the Health Centre.

**Near misses** should also be reported to the Health, Safety and Risk Manager, who will investigate, and act as required.

### **3.7 Accident investigation**

Accident report forms will be sent without delay to the Health, Safety and Risk Manager. The Health, Safety and Risk Manager, will arrange for accidents and near misses to be investigated if required;

- ☐ to determine the need for any remedial action and
- ☐ in appropriate cases where litigation is anticipated to arise, the dominant purpose may be to act upon legal advice and investigate to prepare for the conduct of such litigation.

For serious incidents, the Health, Safety and Risk Manager should obtain specialist health & safety legal advice before commencing an investigation. In appropriate cases, the specialist lawyer will commission an investigation and report for the dominant purpose of the conduct of anticipated litigation. Such reports will be protected by legal privilege and circulation of the full report will need to be restricted, although details of any remedial actions may be circulated more widely as appropriate.

### **3.8 Road Safety**

Road safety risk can be divided into three key areas;

- ☐ Motor vehicle risk, either by hired in vehicles with professional drivers, or College vehicles driven by College staff
- ☐ Pupils and staff on bicycles – including scooters
- ☐ Pedestrian movement within the College grounds and when using crossing points on roadways between College buildings

#### **3.8.1 Motor vehicle risk**

Details of how the motor vehicle risk is managed can be found in the Transport Policy on Digizone.

Drivers must follow the rules of the road when driving a College vehicle and when in their own vehicles on site and namely;

- ☐ Maximum speed on site of 5mph
- ☐ Vehicle to be insured, MOT'd and in roadworthy condition
- ☐ Wear a seat belt when in a moving vehicle
- ☐ Do not use a mobile phone when driving a vehicle
- ☐ Be alert to pupils and staff on internal roads and crossing points around College



Instructions are given to contractors, and regular delivery drivers and waste collectors on safe driving of large goods vehicles on site.

### **3.8.2 Bicycles and scooters**

Pupils are permitted to ride bicycles to and from lessons and are required to comply with the following standards;

- ☐ Comply with the rules of the road
- ☐ Bike to be in good working order
- ☐ Lights and reflectors on bike
- ☐ Helmet to be worn and hi visibility clothing
- ☐ Provide a cycle lock and secure the bike when it is unattended

Staff should set a positive example and follow these rules if cycling to work on their bikes

Pupils and staff are not permitted to use cycles, scooters, or powered scooters on College internal walkways.

### **3.8.3 Pedestrian road safety risk**

Traffic controlled pedestrian crossing points are located at;

- ☐ Thirlestaine Road near Chandos Driveway - Pelican Crossing (Traffic light controlled)
- ☐ Sandford Road near College Road junction - Pelican Crossing (Traffic light controlled)
- ☐ Thirlestaine Road near Sports Centre – Zebra Crossing

The crossing points have zig-zag lines on their approaches and school crossing signs on the main roads approaching the crossings.

Pupils receive input on road safety and safe use of the crossing points in Year 7 at Prep and on induction at College. Training videos are available on the Digizone, (Health and Safety Portal).

Defects involving the traffic signals should be reported immediately to Gloucestershire Highways on 08000 514514 or online at; <https://www.gloucestershire.gov.uk/highways/roads/your-highways-report-it/>

## **3.9 Emergency procedures**

Setting out the contingency arrangements in case of a major incident, including what happens in the case of an overnight emergency where the premises need to be evacuated;

### **3.9.1 Emergency Procedures and Crisis Planning;**

- ☐ **Fire Safety Policy** – details of the College approach to fire safety can be found in the fire safety policy, which can be found on the Policy Portal;
- ☐ **Lockdown Policy** - details of dealing with intruders on site and Lockdown can be found in the Lockdown Policy, this can be found on the Policy Portal.
- ☐ **Major incident planning including duties of the SMT Crisis Plan** – Members of SMT's have access to the Crisis Plan.

### **3.9.2 Crisis or Emergency affecting Boarding House Accommodation during boarding hours**

In the event of a crisis, involving a Boarding House, (or more than one boarding house) during boarding hours, where pupils and staff will not be able to immediately return to their House, they will relocate to one of the Day Houses-- the following arrangements are in place;

- ☐ Girls Houses will relocate to Queens House  
(In the case of more than one house being affected, distribution between other girls' houses and TLG.)
- ☐ Boys Houses will relocate to Southwood House  
(In the case of more than one house being affected, distribution between other boys' houses and the Sports Hall).
- ☐ In the case of the entire premises requiring evacuation, this would be a major incident across the town; the school would evacuate in accordance with the local disaster plan to a designated refuge. Circumstances surrounding a whole school evacuation and the Cheltenham College decision making process is covered in the Crisis Plan.

Once relocated to the relative safety of the Day House/TLG/Sports Hall, the HSM or staff member in charge can, depending upon the circumstances;

- ☐ plan to remain in the Day House until their House is ready to be reoccupied, or
- ☐ plan to move pupils to more permanent locations, namely;
  - Pupils who live locally to be collected by parents/guardians or transported home
  - Identify spare boarding availability in other Houses and prioritise pupils to take these spaces
  - Use sick bays in Houses and Health Centre
  - Liaise with SLT to agree and arrange local overnight hotel accommodation

### **3.9.3 Contingency for longer term relocation of Boarding Pupils**

Where a Boarding House, or part of, is substantially damaged during a crisis, a decision will be made through the Incident management Team (IMT) for the short-medium term relocation of boarding pupils, options include;

- ☐ Pupils who are local to Cheltenham to go home to make way for those displaced from the affected Boarding House
- ☐ Relocate pupils to fill any vacant boarding accommodation in other Houses
- ☐ Relocate pupils to available boarding accommodation at Cheltenham Ladies College or Dean Close
- ☐ Consider local hotel accommodation
- ☐ Call upon a temporary modular residential facility to locate on College Field
- ☐ Repurpose an existing College building for Boarding use

Further details on the approach to a longer-term relocation of pupils from an affected Boarding House can be found in the Crisis Plan.

### **3.10 Infection Control**

College adapts its procedures to ensure that College and Prep deliver their core functions, within a safety system, to best protect pupils, staff and visitors and be an effective College.

Both schools maintain a steady state of protection against infections with provision of surface cleaning materials and hand sanitising. These procedures are built into departmental risk assessments.

College aligns its approach with regional or national guidance provided in the event of an infection outbreak. Guidance in these events will come from the NHS, Department for Education or Gloucestershire Director for Public Health.

### **3.11 Manual Handling**

The Manual Handling Operations Regulations (Revised 2002) primarily affects staff. Pupils should not be required to undertake manual handling operations that are beyond the capabilities of the individual.

There is a duty to avoid the need for manual handling operations, that involve a risk of injury, so far as is reasonably practicable. An assessment of the risks in those manual handling operations, which cannot be avoided, should be made.

Many manual handling operations take place each day around Cheltenham College. The intention is to target operations that cannot be avoided or eliminated, and which are liable to present a risk of injury and it is this category, which needs further specific assessment.

Training is available for staff who undertake manual handling roles.

### **3.12 Working at Heights**

Falls from height are one of the biggest causes of workplace fatalities in the UK. The HSE defines a 'height' as a distance that a person could fall that would be liable to cause injury. This therefore means any height and many injuries are a result of falls from relatively low heights.

Typical falling from height scenarios are;

- ☐ Falls from working on a ladder or flat roof
- ☐ Falling through a fragile surface
- ☐ Openings in a floor or hole in the ground.

The simple steps to follow for working at heights are;

- ☐ To avoid working at height if it is reasonably practicable
- ☐ Where work cannot be avoided, to use the right equipment or to work from an existing safe place (e.g. a balcony or walkway) or use the appropriate access equipment which is fit for purpose.

Where work is undertaken you should;

- ☐ Do as much work from the ground, or a relatively safe place, rather than using height access equipment
- ☐ Ensure workers can get safely to and from the working height
- ☐ Ensure that access equipment is fit for purpose – tested and maintained
- ☐ Not overload the equipment or overstretch whilst working at height
- ☐ Take extra precautions on fragile surfaces (including flat roofs)
- ☐ Protect persons on the ground from falling objects
- ☐ Consider emergency evacuation – in the event of fire or other emergency can the workers extract themselves quickly.

Height's training is available for College staff who work at heights.

### **3.13 Lone working**

College has a duty to manage the health and safety risks of staff who work alone, this duty equally applies to contractors, self-employed staff, homeworkers, and volunteers.

Lone workers are those who work by themselves, without close or direct supervision, such staff might include;

- ☐ Trades people, ground staff and gardeners
- ☐ Porters and Security
- ☐ Housekeeping staff
- ☐ Drivers
- ☐ Home workers

The risks for lone workers are due to the reduced level of direct supervision and that help, if required in an emergency, may be delayed. Therefore staff working in higher hazard areas, present the highest risk with regards to their safety when lone working. Such hazards could include;

- ☐ Working at heights
- ☐ Working in confined spaces
- ☐ Working with hazardous or highly flammable materials
- ☐ Electricians who are exposed to live electrical conductors
- ☐ Where there is potential for conflict or even violence

These activities will be the subject of a risk assessment. Where these hazards are regularly undertaken by lone workers, this risk should be addressed in the risk assessment.

Contractors undertaking specified tasks will complete a permit to work either in advance or on arrival at Estates and before conducting the work.

Staff should be trained to know when to ask for help when they are engaging in hazardous activities, to ensure that support and supervision can be put in place.

Where workers work consistently on their own, they should know how to raise an alarm if they need emergency help and be able to perform basic first aid on themselves.

Homeworkers, who work away from the workplace for extended periods, can feel isolated and may feel stressed. Line managers should monitor and keep in touch with their homeworkers. Homeworkers should have contact details for their line managers.

On occasions, due to the nature of the role, hazards involved, potential for isolation, or if there are underlying health conditions, it may be appropriate to undertake an individual risk assessment. The line manager and staff member should engage with this, and the Health and Safety Manager will provide guidance on the process and help identify controls.

### **3.14 Departmental Responsibilities**

Heads of Department should consider the need to access heights during their activities within the departmental risk assessment. The Health, Safety and Risk Manager can be contacted for further advice on access requirements and any associated training.

### **3.15 Security**

The layout of Cheltenham College makes it difficult to avoid a degree of access by the public. Staff and pupils are asked to remain vigilant to security threats. Suspect persons or packages should be reported immediately to Security or a senior member of College. In the meantime, if the threat is serious the alarm should be raised. The Lockdown Policy can be found on the Policy Portal.

Staff must ensure their identification badge and lanyard are always visible. Staff who wear branded uniform may, for safety reasons, prefer to carry their identification card.

Although checked by Night Security Team, employees and pupils must ensure that they close external doors and windows to prevent unauthorised access to all buildings, day and night.

### **3.16 Smoking and Vaping**

The Smoke-free (Premises and Enforcement) Regulations 2006 came into effect on 1 July 2007. It is Cheltenham College policy that the entire premises (enclosed areas) and College vehicles are smoke-free; and that all employees, pupils and visitors have a right to a smoke-free environment. This policy applies to every employee, pupil, visitor, and contractor. This policy applies equally to electronic cigarettes (vaping).

Staff who smoke will be informed of the timing and location of breaks by their line manager. Designated areas will be made obvious by the presence of smoking bins provided to allow smokers to safely dispose of waste smoking materials.

Adequate and appropriate 'No Smoking' signage is clearly displayed at entrances to each building in accordance with the Smoke Free (Signs) Regulations 2012.

A Smoking and Vaping Policy relevant to Pupils, produced by the DSL can be found on the Policy Portal.

### **3.17 Visitors and Contractors**

Visitors are those on site who are not employed by Cheltenham College. *Visitors include temporary workers and contractors*, as well as people only on site for a few hours or minutes, such as friends or family members of staff, members of the public and associates touring the site. The procedures below should be followed:

- ☐ Visitors report to Main or Prep reception, signed-in, given 'Visitor Information' and directed to the safeguarding section and collect identity badge (always worn visibly).
- ☐ Temporary workers and contractors will be directed to the appropriate reception or department of College to sign in.

- ☐ When a member of staff invites a visitor to College, he / she must always accompany the visitor and is responsible for their safety whilst on site.
- ☐ Ensure that visitors are directed to staff and visitors' lavatories only.
- ☐ Ensure that any hazardous areas are off limits to visitors
- ☐ Contractors undertaking hazardous work processes at College are asked to provide their RAMs (Risk Assessment and Method Statement) before work commences. Upon arrival they are signed in and given a 'permit to work'. For some high-risk working or processes, Cheltenham College may ask for details of qualifications and other evidence of competency considered relevant to the safe conduct of the task.

Further Information can be found in the Visitors Policy on the Policy Portal.

### **3.18 Construction (Design and Management) Regulations 2015**

The Estates Bursar will seek to ensure that Cheltenham College complies with all relevant aspects of the CDM regulations 2015. It is important that all staff comply with the safety plan, in particular any restrictions on entering a site while work is in progress.

### **3.19 Drones**

Drone footage may be required by Cheltenham College for publicity or marketing purposes or for undertaking surveys of buildings, or gas, water, or electric mains.

Operating and flying drones requires a high level of training, licencing, and arrangements for risk assessment and insurance. Therefore, Cheltenham College only operate drones in controlled circumstances.

College operates its own drones in a controlled way with the appropriate licences, training and agreement with insurers. Otherwise a drone, will be bought in from an approved contractor. Approved drone contractors will have a Civil Aviation Authority (CAA) licence to operate, and have drone insurance and a risk assessment.

Staff or pupils must not bring their drones on site without permission. Any request for pupils to use a drone (as part of their studies) or from staff, needs to be risk-assessed and approved by the Bursar or Health, Safety and Risk Manager.

### **3.20 Health and Safety Executive Inspections**

Health and safety law is enforced by inspectors from the Health and Safety Executive (HSE) or by inspectors from other authorities such as the Independent Schools Inspectorate and the Fire Authority. HSE Inspectors have the right to enter any workplace without giving notice, though notice may be given where the inspector thinks it is appropriate. On a normal inspection visit an inspector would expect to look at the workplace, the work activities, the management of health and safety, and to check that Cheltenham College is complying with health and safety law. The inspector may offer guidance or advice to help. They may also talk to employees and their representatives, take photographs and samples, serve improvement notices, and act if there is a risk to health and safety which needs to be dealt with immediately.

### **3.21 Health and Safety Executive – Fee for Interventions.**

HSE operates a Fee for Intervention (FFI) cost recovery scheme. Under The Health and Safety (Fees) Regulations those organisations who break health and safety laws are liable for covering the HSE's related costs, including inspection, investigation and taking enforcement action.

### **3.22 The Health and Safety Committee and Safety Representatives**

#### **3.22.1 The Health and Safety Committee**

The Health and Safety Committee is chaired by the Deputy Bursar and has representative members from College and Preparatory Schools and Support.

#### **3.22.2 Health and Safety Terms of Reference:**

- ☐ To maintain an overall assessment of the key Health and Safety risks in the form of a Health and Safety Development Plan, from which priorities for action are set and reviewed annually.
- ☐ Where there is a significant risk, to determine and ensure action is taken to mitigate such risk.
- ☐ To provide feedback and guidance to Council.
- ☐ To facilitate effective communication with employees.
- ☐ To approve health and safety priorities to be included in the Health and Safety Development Plan.

#### **3.22.3 Safety representatives**

May be nominated from departments and they represent the department and consult the employer on health and safety matters. The safety representative or Health, Safety and Risk Manager are the first points of contact for health and safety concerns that staff may have. The safety representative does not have to be the HOD or HSM.

#### **3.22.4 Safety representatives' duties**

Although regulations give safety representatives wide powers, they impose no additional duty. Representatives are given immunity from prosecution for anything done in breach of safety law while acting as a safety representative. Please see the First Aid policy for departmental safety representatives' duties for first aid.

Safety Representatives can:

- ☐ Investigate potential hazards and causes of accidents.
- ☐ Investigate complaints about health and safety and welfare made by employees
- ☐ Make representations to Cheltenham College about the hazards or complaints
- ☐ Make representations to the employer about general matters of health, safety, or welfare
- ☐ Carry out inspections of the workplace
- ☐ Represent employees in consultation with inspectors of appropriate enforcing authorities
- ☐ Receive information from those inspectors
- ☐ Attend safety committee meetings in the capacity of a safety representative in connection with any of the above functions

### **3.23 Personal Protective Equipment (PPE)**

PPE is the last line of defence in protecting employees from harmful substances, processes, or conditions. However, when a residual risk remains, employees must use PPE provided, as shown by their HOD or Line Manager.

*To ensure suitability Cheltenham College must seek to ensure that:*

- ☐ The PPE is appropriate for the risks and working conditions
- ☐ The needs of the employee are considered
- ☐ The PPE fits the individual correctly
- ☐ The PPE gives adequate protection, (including face fit testing for respiratory protective equipment, (RPE), where required)

*Cheltenham College will also seek to ensure that:*

- ☐ Where 2 or more types of PPE are used that they are compatible
- ☐ An assessment of the suitability of each type of PPE is carried out
- ☐ The PPE is maintained, cleaned and replaced as per the manufacturer's instructions
- ☐ Suitable and sufficient storage is provided for the PPE
- ☐ Suitable training, instruction and information are provided on each item of PPE
- ☐ Individuals are using the PPE (Employees must also inform Cheltenham College if their PPE is lost or damaged in any way)

### **3.24 Control of Substances Hazardous to Health (COSHH)**

College recognises its duty to ensure that the exposure of its employees and others to substances that are hazardous to health is prevented. Where this is not reasonably practicable, the exposure shall be adequately controlled by other means.

Cheltenham College will not carry out any work liable to expose staff or others to any substance hazardous to health, unless a suitable and sufficient assessment of:

- ☐ The risk created by the work to the health and safety of the staff or others involved has been undertaken
- ☐ The steps that need to be taken to meet the requirements of the regulations, and has implemented such steps
- ☐ Whether less hazardous alternatives to the planned substance are available

*Each HoD is responsible for identifying substances that requires an assessment within their department.*

The COSHH assessment shall include consideration of:

- ☐ The hazardous properties of the substance
- ☐ Information on health effects provided by the supplier, including the information given on relevant safety data sheets
- ☐ The level, type, and duration of exposure
- ☐ The circumstances of the work, including the amount of substance involved
- ☐ Activities such as maintenance, where there is the potential for high levels of exposure
- ☐ Any relevant occupational exposure standard, maximum exposure limit or other similar occupational exposure limit
- ☐ The effect of preventative and control measures
- ☐ The results of relevant health surveillance
- ☐ The results of monitoring of exposure



- ☐ Circumstances where work involves exposure to more than one hazardous substance, and the risk presented by exposure to such a combination
- ☐ The approved classification of any biological agent
- ☐ Any additional information that Cheltenham College might need to complete the assessment

The COSHH assessment must be reviewed regularly and immediately when:

- ☐ It is suspected that the assessment is no longer valid
- ☐ There has been a significant change in the work to which the assessment relates
- ☐ The results of any monitoring show it to be necessary

The assessments must be recorded and displayed where all individuals likely to be involved with the substance in question may see them.

Science Departments use CLEAPs guidance to provide advice on the use of chemicals in a school laboratory environment.

### **3.25 Radiation Sources**

The school holds a radiation licence and stores and uses radiation sources in accordance with the licence. A member of staff is designated and trained as the Radiation Protection Supervisor. Only experienced science staff can sign out and use the sources. A copy of the source inventory is held at the front of the Science Block for emergency services.

### **3.26 Water Quality including Legionellosis**

The Estates Bursar oversees the appropriate action of monitoring and testing for legionella bacteria throughout Cheltenham College. This is in accordance with the Approved Codes of Practice (ACOPs) for the control of legionella bacteria in water systems (L8).

### **3.27 Asbestos**

Cheltenham College operates an Asbestos Management Plan. The Estates Bursar is responsible for controlling work related to asbestos with assistance from the Health Safety and Risk Manager and shall act in accordance with the Control of Asbestos Regulations 2012 and associated approved codes of practice. Staff are reminded that it is vital that Estates is contacted immediately if it is suspected that asbestos has been damaged or disturbed. No work will be permitted in any Cheltenham College property unless the most recent asbestos survey has been consulted. Asbestos surveys are held in the Estates Department and on the Health and Safety Portal.

### **3.27 Additional Arrangements**

Other health and safety information that is not specifically covered in this policy or in departmental policies can be obtained upon request from the relevant senior health and safety representative (Bursar, Deputy Bursar, Estates Bursar or Health, Safety and Risk Manager).

### **3.28 Additional arrangements for specific Departments**

Where a specific hazard or risk is not listed in this main Cheltenham College Policy, it is the responsibility for the HOD/Activity/Sport to ensure that additional arrangements (safe systems of work and specific detailed risk assessments) are in place and available within the department.

## Appendix

### List of Abbreviations

<b>CLEAPS</b>	Consortium of Local Education Authorities for the Provision of Science Services - is an advisory service providing support in science and technology for a consortium of local authorities and their schools including establishments for pupils with special needs.
<b>COSHH</b>	Control of Substances Hazardous to Health' - under the Control of Substances Hazardous to Health Regulations 2002, employers need to either prevent or reduce their workers' exposure to substances that are hazardous to their health.
<b>DSEAR</b>	Dangerous Substances and Explosive Atmospheres Regulations
<b>EYFS</b>	Early Years Foundation Stage
<b>HoD</b>	Head of Department
<b>HSE</b>	Health and Safety Executive
<b>HSM</b>	Housemaster or Housemistress
<b>KCSIE</b>	Keeping Children Safe in Education - Department of Education Statutory Guidance
<b>PPE</b>	Personal Protective Equipment protects the user against health or safety risks at work. It can include items such as safety helmets, gloves, eye protection, high-visibility clothing, safety footwear and safety harnesses. It also includes respiratory protective equipment (RPE).
<b>PUWER</b>	Provision and Use of Work Equipment Regulations 1998 - these Regulations place duties on people and organisations who own, operate, use, or have control over work equipment.

**Safety Committee** Cheltenham College Health, Safety and Welfare Committee