

Health & Safety Policy

Contents

1.	Section 1	
1.1	Introduction and Objectives	4
1.2	General Statement of Health and Safety Policy	4
2.	Organisation and Responsibilities for Health and Safety	
2.1	The Court of Governors	7
2.2	Management Duties for Health and Safety	7
2.3	The Director of Operations (Foundation Health & Safety Officer)	8
2.4	Heads of Departments	8
2.5	Boarding and Day Housemaster/Housemistress/House Parent/Head of Boarding	9
2.6	Laboratory Technicians	10
2.7	Functional Managers	11
2.8	Full Time, Part Time and Temporary Employees and Volunteers	11
2.9	Specific Arrangements.....	11
3.	Arrangements for Health and Safety	
3.1	Management of Health and Safety at Work Regulations.....	13
3.2	Foundation Health and Safety Committee	13
3.3	Competent Persons	13
3.4	Estates Operating Instructions	13
3.5	Training.....	13
3.6	Accident Reporting.....	14
3.7	Fire Risk: Evacuation	16
3.8	Fire Risk: Assessment	17
3.9	School Trips and Outings	18
3.10	Minibuses	19
3.11	First Aid	19
3.12	Science Teaching	19
3.13	Combined Cadet Force	20
3.14	Physical Education, Sports and Other Activities.....	21
3.15	Use of School Facilities By Member of The Public	21
3.16	Portable Appliance Testing	21
3.17	Laundry.....	21
3.18	Catering and Cleaning	21
3.19	COSHH Regulations.....	22
3.20	Electricity At Work Regulations.....	22
3.21	Machinery Guarding and Work Equipment.....	23
3.22	Abrasive Wheel Machines	23



3.23	Safety of Pressure System	23
3.24	Noise	24
3.25	Manual Handling	24
3.26	Personal Protective Equipment.....	25
3.27	Control of Legionellosis	25
3.28	Swimming Pool	27
3.29	Hire of Pool by Outside Organisations.....	28
3.30	Managing Asbestos	28
3.31	Mobile Access Tower	29
3.32	Disclosure and Baring Service	29
3.33	Ground Staff.....	30
3.34	General Instructions for Contractors.....	30
3.35	Lifts and Hoists	32
3.36	Gas.....	32
3.37	Waste Disposal	33
3.38	Design and Technology Teaching	33
3.39	SENDA	33
3.40	Lone Working.....	34
3.41	Safety Signs	34
3.42	Slips Trips and Falls.....	34
3.43	Disaster and Emergency Planning	34



Section 1

1.1 Introduction and Objectives

This documentation has been prepared in accordance with Section 2 (3) of the Health and Safety at Work etc. Act 1974. It describes the safety management strategy to comply with requirements from the Management of Health and Safety at Work Regulations 1999 to ensure there are appropriate arrangements in place to plan, organise, control, monitor and review safety and reviews the non-statutory advice from the DfE Health and Safety Advice on Legal Duties and Powers.

The Mill Hill School Foundation offers education to boys and girls aged between 3 and 18 in its five Schools.

Mill Hill School, Belmont School, Grimsdell School and Mill Hill International School (The Mill Hill Schools) occupies over 150 acres of grounds just 10 miles from Central London and within easy reach of Heathrow, Gatwick, Stansted and Luton Airports, motorways, bus, underground and rail links. Cobham Hall occupies a 150 acre site in Cobham, Kent.

There are approximately 600 employees who work within various departments across the estate, these include amongst others:

- Teaching – teaching a variety of subjects
- Pastoral care – 24hr/7-day week care for the pupils
- Grounds – maintaining the gardens and grounds around the Foundation
- Maintenance – a multi skilled team who maintain the Foundation's estate
- Housekeeping – cleaning the accommodation and surrounding buildings
- Hospitality – providing catering and dining services for pupils and staff

The Mill Hill School Foundation Court of Governors is accountable to the wider Foundation community and must provide good governance of the Foundation and its strategic direction and must give effect to the Foundation's vision by providing and conserving infrastructure and necessary capital resources. The Foundation Council and the CEO work in partnership to achieve the purpose and mission of the Foundation.

1.2 General Statement Health and Safety Policy

Mill Hill School Foundation and its Court of Governors are committed to providing, so far as reasonably practicable, a safe and healthy Foundation for all employees, pupils, parents, visitors to our site, contractors and all those who could be affected by our activities.

In our role as employer we attach a high priority to ensuring the Foundation's environment, both educational and support, is delivered in an appropriate manner and complies with the provisions of the Health and Safety at Work etc. Act 1974 and the Management of the Health & Safety Regulations 1999 and all subsequent legislation.

The Court of Governors has the ultimate collective responsibility for the implementation of this policy. Through the Estates Committee the Court will ensure that the requirements of health and safety legislation are implemented wherever practicable. The CEO has overarching responsibility for all areas of Foundation life but delegates the operational management to the Head of each School, who are responsible for the day-to-day implementation of this policy within their Schools. However, overall responsibility for coordination

and compliance is delegated to the Director of Operations. Matters that cannot be resolved at this level must be referred to the Court.

Through all levels of management, particular care will be taken to provide and maintain:

- Processes of risk assessment and control
- Safe and healthy places of work with safe access and egress
- Safe plant, equipment and systems of work
- Proper arrangements for the use, handling, storage and transport of goods and substances
- Information, instruction and training to ensure that all activities are conducted by competent people or under competent and appropriate supervision
- A safe and healthy working environment
- Lone working

A report on health and safety covering: statistics on accidents to pupils, staff and visitors, staff training, fire drills, and all new or revised policies and procedures is tabled at each term's Foundation Health and Safety meeting and reported to the Estates Committee. Cobham Hall will hold a separate meeting which will also be reported at both meetings.

The minutes of the Estates Committee's discussion on health and safety are tabled at each meeting of the full Court of Governors together with any other issues on health and safety that the committee chairperson wishes to bring to the Court's attention.

The external fabric of the Foundation, its plant, equipment and systems of work are surveyed and inspected regularly by competent professionals. These reports (as per point above) are considered by the Court of Governors and its recommendations (together with other defects) form the basis of the Foundation's routine maintenance programmes.

The Foundation's adherence to health and safety in catering and cleaning of the food preparation and eating areas is subject to external inspection by the Environmental Health Officer (EHO). In addition, the Domestic Bursar for the Mill Hill Schools and the Estates Manager at Cobham Hall, arrange for an independent hygiene and safety audit of food storage, meal preparation and food serving areas annually, together with regular external deep cleaning and pest control services. The Director of Operations reports on all these aspects to the Estates Committee.

The Foundation has fire risk assessments, carried out by a competent person, which are reviewed every year for progress on completion of items in the action plan and are updated every two years, more frequently if significant changes are made to the interior of buildings or new buildings are bought or added. The Health and Safety Committee will review this risk assessment every time it is amended and submit a report to the Estates Committee.

An external health and safety consultant reviews the overall arrangements for health and safety, including fire safety, the general state of the Foundation, and reports on actions required with recommended timescales. The progress of implementation will be monitored by the Estates Committee.

Each School is to provide training and induction for new staff in health and safety related issues. This is to include both "standard" induction training and training appropriate to the individual member of staff's

functions. First Aid training and minibus driver training are to be provided to members of staff who are involved with trips and visits.

All members of staff are responsible for taking reasonable care of their own safety, that of pupils, visitors, temporary staff, volunteers and contractors. They are responsible for co-operating with the Foundation Management Team in order to enable the Court of Governors to comply with health and safety duties. Finally, all members of staff are responsible for reporting any significant risks or issues to the Director of Operations.

This Policy statement shall be reviewed, revised where necessary, and re-approved annually by the Full Court of Governors.

Signed:



Elliot Lipton
Chair of the Court of Governors

ELT Updated	June 2022
Next Review Date	June 2023
Council Committee	Estates Committee

Section 2

Organisation and Responsibilities for Health and Safety

Management Structure

2.1 The Court of Governors

- 2.1.1 The Court of Governors accepts full responsibility for health and safety within the Schools.
- 2.1.2 The Court of Governors considers that one of their primary objectives is to provide the best possible safe and healthy working conditions for employees and to ensure that their work does not adversely affect the health and safety of other people.
- 2.1.3 The Court of Governors recognises its corporate responsibility as employer to ensure, so far as is reasonably practicable, that this same safe and healthy environment is also provided for pupils and all other people who visit the Foundation.
- 2.1.4 The Court of Governors is committed to ensuring that the Foundation operates in accordance with current legislation. They are not, however, content to merely conform to minimum acceptable standards but are determined to ensure the best possible standards are met.
- 2.1.5 Through the Foundation Health & Safety Committee, Estates Committee and other reporting mechanisms, ie. Heads Reports to the Court of Governors and routine Executive reports to the CEO, the Court will constantly monitor the effectiveness of the implementation of this Policy and will revise it where necessary.
- 2.1.6 The Court of Governors will ensure that any changes in this Policy will be drawn to the attention of all employees.
- 2.1.7 The Court of Governors will establish an information gathering and reporting procedure so that its decision making on health and safety is soundly based and is current.

2.2 Management Duties for Health and Safety

- 2.2.1 The Heads of each School directly, or through delegated responsibility to other members of staff, in accordance with the law, will be responsible to the Court of Governors for the safe functioning of all school activities. They will:
 - i. monitor the effectiveness of the Policy as regards both academic and non- academic work and report back to the Court of Governors as appropriate;
 - ii. consult with the Director of Operations as the nominated Foundation Health and Safety Officer;
 - iii. recommend changes in the Health and Safety Policy in the light of experience;
 - iv. ensure the cooperation of all staff at all levels as regards working to this Policy;
 - v. be responsible for ensuring that all academic and teaching-support staff directly employed by them fully understand their responsibilities and are given both the time and the encouragement to pursue them;
 - vi. take steps to ensure that any changes in curriculum and also changes in systems of work on the domestic side are considered for their health and safety implications;
 - vii. delegate some of their listed responsibilities to the Deputy Head(s) or, in the case of Cobham Hall, the Estates Manager, as deemed appropriate.



2.3 The Director of Operations (Foundation Health and Safety Officer)

- 2.3.1 On a day-to-day basis the Heads' responsibility with regard to the domestic and administrative side of the Foundation will be devolved to the Director of Operations. The Director of Operations will:
- i. be appointed as the Foundation's nominated Health and Safety Officer having responsibility for obtaining, interpreting and disseminating all relevant health and safety information to the four schools via the normal line management structure;
 - ii. monitor the effectiveness of this Policy and report back to the Heads and the Court of Governors as appropriate;
 - iii. be the liaison point with the Foundation Health and Safety Consultants and ensure that the professional services of suitably qualified Safety consultants.
 - iv. in a line management function at the Mill Hill Schools, and through the Cobham Hall Estates Manager for Cobham Hall, ensure the cooperation of all administrative, maintenance, catering, estates, security and domestic staff at all levels as regards the working of this Policy;
 - v. be responsible for ensuring that all maintenance contracts involving outside bodies which monitor certain aspects of the Foundation functions are used and kept up to date;
 - vi. be responsible for ensuring that all individual employees in the various domestic functions listed above who are given posts of intermediate management responsibility fully understand their responsibilities and are given the necessary instructions, time and the encouragement to carry out the functions that they have been given;
 - vii. chair the Foundation Health and Safety Committee;
 - viii. establish a system for the reporting back of all accidents, incidents, near misses and damage to Foundation property and investigate accordingly. The results of these investigations, as well as being dealt with by the line management function, would then be discussed by the Foundation Health and Safety Committee and reported to the Estates Committee and to the Court;
 - ix. ensure that all RIDDOR (Reporting of Diseases & Dangerous Occurrences Regulations 2013) are fully complied with. [hse.gov.uk/riddor](https://www.hse.gov.uk/riddor)
 - x. be responsible for liaison with outside bodies who may from time to time use the facilities of the Foundation, and ensure that appropriate action is taken both to ensure these bodies have sufficient knowledge of the Foundation procedures and that the Foundation itself is appropriately indemnified;
 - xi. be responsible for the selection of outside maintenance contractors and the monitoring of all activities on the Foundation premises, and in this context be responsible for liaison with the Mill Hill Schools estates department.
 - xii. delegate some of his listed responsibilities to the school Health and safety advisor or Estates team if deemed appropriate.

2.4 Heads of Department

- 2.4.1 Within this Policy the term "Head of Department" refers to both Heads of Teaching and Support Departments and encompasses the Cobham Hall 'Heads of Faculty'. Every Head of Department and employee with a supervisory role is responsible for ensuring, in accordance with the law, the health and safety of employees, pupils and other persons in their area of responsibility and also anyone else who may be affected by their work activities.

In particular, the Heads of Department will be responsible to the Heads of their respective schools

for the following:

- i. For notifying the Head and the Foundation Health and Safety Officer of any planned, new or newly identified significant hazards in their areas that they have identified via the risk assessment process, and also of the control measures needed to avert any risks involved;
- ii. for ensuring that their department is run according to the standards laid out in this Policy, minimum legal standards and other appropriate standards that may be set by the Foundation;
- iii. they will be responsible for ensuring that the teachers and any other adult staff working under them understand the practical aspects of this Policy and the various legal requirements that apply within their areas of responsibility;
- iv. they should be responsible for ensuring that these teachers and adult staff are aware of the degree of priority that these matters carry and where appropriate, they would be provided with both the time and encouragement to pursue such matters;
- v. notify the Heads of any matters within this field that they feel are beyond their competence to deal with;
- vi. they should be responsible for reporting to the Director of Operations, through the Deputy Head with delegated responsibility for Health and Safety, any accidents, incidents, near misses or damage for appropriate investigation;
- vii. they should be responsible for informing the Director of Operations, through the Deputy Head with delegated responsibility for Health and Safety, or Cobham Hall Estates Manager as appropriate, of any potential hazards in the fabric or structure;
- viii. they will be responsible for ensuring adequate supervision for pupils working in their department during normal teaching activities;
- ix. as regards COSHH (Control of Substances Hazardous to Health) Regulations, they will be responsible for notifying directly to the Director of Operations and the school health and safety advisor any new substances that are required to be purchased by their departments;
- x. as regards DSEAR (Dangerous Substances and Explosive Atmospheres Regulations 2002) they will be responsible for notifying directly to the Director of Operations any new substances that are required to be purchased by their departments;
- xi. they will be responsible for ensuring that the teaching staff for whom they are responsible co-operate fully with any fire practices and other emergencies as specified in Part 3 of this Policy;
- xii. they will constantly monitor all rooms under supervision as to correct use of electrical equipment;
- xiii. they will ensure that all means of escape in case of fire are at all times kept free and unobstructed;
- xiv. they will contact the Director of Operations, through the Deputy Head with delegated responsibility for Health and Safety, or Cobham Hall Estates Manager as appropriate, if there are any problems with the location and allocation of fire extinguishers or other fire safety equipment.

2.5 Boarding and Day Housemaster/Housemistress/House Parents/Head of Boarding

- 2.5.1 The Housemaster/Housemistress/House Parents will be responsible to the Mill Hill Schools Head of Boarding or Cobham Hall Head of Boarding and Pastoral, as appropriate, for the following:

- i. for ensuring that his/her House is run according to the standards laid out in this Policy, minimum legal standards and other appropriate standards that may be set by the Foundation;
- ii. they will be responsible for ensuring that members of staff working under them understand the practical aspects of this Policy and the various legal requirements that apply within their areas of responsibility;
- iii. for ensuring that such staff members are aware of the degree of priority that these matters carry;
- iv. for providing such adult staff with reasonable time and the encouragement to pursue such matters;
- v. notifying the Heads of any matters within this field that they feel are beyond their competence to deal with;
- vi. reporting to the Director of Operations, through the Deputy Head with delegated responsibility for Health and Safety, or Cobham Hall Estates Manager as appropriate, any accidents, incidents, near misses or damage for appropriate investigation;
- vii. informing the Director of Operations, through the Deputy Head with delegated responsibility for Health and Safety, or Cobham Estates Manager as appropriate, of any potential hazards in the fabric or structure;
- viii. ensuring adequate supervision for pupils inside their House at all times;
- ix. in respect of COSHH Regulations, they will be responsible for notifying directly to the Director of Operations any new hazardous substances that are required to be purchased by their House, except when supplied by the Mill Hill Schools Domestic Bursar or Estates Manager or the Cobham Hall Catering and Domestic Support Services Manager
- x. ensuring that the adult staff, for whom they are responsible, co-operate fully with any fire practices and other emergencies as specified in Part 2 of this Policy;
- xi. ensuring that all fire doors are kept closed at night, this work being undertaken by themselves and not delegated to pupils;
- xii. making arrangements for night-time fire practices at the agreed frequency (boarding Housemasters/Housemistresses/House Parents only);
- xiii. ensuring that all pupils and sleeping-in academic and domestic staff in the house are fully familiar with all fire instructions (boarding Housemasters/Housemistresses only);
- xiv. regular monitoring all rooms under their supervision as to correct use of electrical equipment;
- xv. ensuring that all means of escape in case of fire are at all times kept free and unobstructed;
- xvi. contacting the Director of Operations, through the Deputy Head with delegated responsibility for Health and Safety, or Cobham Hall Estates Manager as appropriate, if there are any problems with the location of fire extinguishers or the fire safety equipment.

26 Laboratory Technicians

- 2.6.1 They will be responsible to the Head of Science or Head of Department as appropriate for the following:
- i. gas supplies which will be switched off whenever they are not required, e.g. at the end of a practical;



- ii. the constant security of all toxic and highly flammable substances which may be used in their department;
- iii. to this end ensuring that all stores are kept securely locked when not actually being supervised;
- iv. for ensuring that all experiments and services are rendered safe, so far as it is safe to do so, on hearing the fire alarm;
- v. for ensuring that a sufficient number of the correct fire extinguishers are available within, or close to, the Prep rooms;
- vi. for reading and acting upon all information supplied by the Head of Science;
- vii. for checking the contents of the First Aid Box and Eye Wash facilities on a monthly basis and informing the appropriate person as listed in Part 3 of this Policy of the Replenishments required.

2.7 Functional Managers

27.1 This section refers to the Line Managers who head secretarial, maintenance, grounds and gardens, cleaning, catering, laundry, domestic, security, the Archivist, Cobham Hall Enterprises and Mill Hill School Enterprises. They will be responsible to the Director of Operations for the following:

- i. for the safe running of their activities;
- ii. for ensuring adequate supervision of all activities so that the work proceeds according to standards laid down in this Policy;
- iii. for ensuring that staff have appropriate training according to the needs of their work;
- iv. undertaking the necessary training needs identified during the course of carrying out work;
- v. for ensuring that all agreed systems of work are followed;
- vi. where they come across matters that they feel are not within their competence to deal with, to refer the matter to the Director of Operations;
- vii. for investigating any accident or incident of a type specified by the Director of Operations and reporting accordingly.
- viii. To insure suitable risk assessments are put in place for all activities

2.8 Full-time, Part-time and Temporary Employees and Volunteers


28.1 The employees of the Foundation will take reasonable care for themselves and other persons who may be affected by their actions and will be fully aware of their duties under Sections 7 and 8 of the Health and safety at Work etc. Act 1974 and also under the specific Codes of Regulations or Practice

- i. they will wear and use all Personal Protective Equipment and safety devices that are provided by the management for their protection and cooperate fully with the management when the latter are pursuing their responsibilities under the above Act;
- ii. they will observe all Safety Rules and Regulations both statutory and school and conform to any safe systems of work that may be developed;
- iii. they will report all accidents, incidents and damage to their immediate superior.

2.9 Specific Arrangements

29.1 In the areas listed below, the holders of the following posts have executive authority for health and

safety in the areas shown:

Mill Hill School	Head of Mill Hill School
Belmont School	Head of Belmont School
Grimsdell School	Head of Grimsdell School
Cobham Hall	Head of Cobham Hall
Mill Hill International	Head of The Mount Mill Hill International School
Departmental Rooms	Heads of Department
Circulation Space	The Mill Hill Schools Estate Manager (+ support from Grounds Manager), or Cobham Hall Estates Manager as appropriate
Non-Departmental Rooms	The Mill Hill Schools Estate Manager (+ support from Premises/Facilities Manager)
The Mill Hill Schools Sixth Form Areas	Assistant Head of Sixth Form
Patrick Troughton Theatre	Head of Drama, Mill Hill School
Catering Areas (The Mill Hill Schools)	Domestic Bursar
Catering Areas (Cobham Hall)	Estates Manager
The Mill Hill Schools Garages and Maintenance Area	Estate Manager
The Mill Hill Schools Swimming Pool and Sports Hall (MHS)	Director of Sport
Sports Hall (Belmont)	Director of Sport, Belmont School 
Swimming Pool (Cobham Hall)	Head of Sport, Cobham Hall
The Mill Hill Schools Grounds and Associated Work Areas	The Mill Hill Schools Grounds Manager
The Mill Hill Schools Playgrounds, Footpaths and Fences	The Mill Hill Schools Grounds Manager
The Cobham Hall grounds	Cobham Hall Head Gardener
The Mill Hill Schools CCF Armoury and Magazine	CCF Contingent Commander
The Mill Hill Schools Obstacle Course	CCF Contingent Commander
Outdoor Learning Classroom	Head of Grimsdell , Head of Belmont (as appropriate)
The Mill Hill Schools Chapel	Chaplain
The Mill Hill Schools Archive	Archivist
Boarding Houses	The Foundation Head of Boarding, or Cobham Hall Head of Boarding and Pastoral

Section 3

Arrangements for Health and Safety

3.1 Management of Health and Safety at Work Regulations

- 3.1.1 It is the policy of the Foundation to comply with the Management of Health and Safety at Work regulations and its Approved Code of Practice.
- 3.1.2 The Foundation will appoint a responsible person/s to make a suitable and sufficient assessment of the risks to health and safety of its employees whilst they are at work, to identify the preventive and protective measures necessary to comply with the requirements of relevant statutory provisions.
- 3.1.3 As where the Risk Assessment identifies any appropriate Health Surveillance, this will be carried out following consultation with suitably qualified and Competent Person/s. As per para 2.3.1 (iii).
- 3.1.4 To assist in undertaking the measures identified by the Risk Assessment as necessary to comply with relevant statutory provisions, the Foundation has appointed a number of Competent Persons (see Section 3.3). Co-ordination of the necessary measures and Competent Persons will be carried out by the Foundation's Health and Safety Officer or delegated competent person. As per para 2.3.1 (iii).
- 3.1.5 The results of the Assessment including identified risks and any necessary preventive and protective measures will be brought to the attention of relevant employees.

3.2 Foundation Health and Safety Committee

- 3.2.1 Meetings: The Foundation Health and Safety Committee and Cobham Hall Health and Safety Committee, will meet at least once per term although members will have recourse to call for an emergency meeting if circumstances so dictate.
- 3.2.2 Terms of Reference: The Terms of Reference for the Foundation Health & Safety Committee are at Appendix 1.

3.3 Competent Persons

- 3.3.1 Under the Management of Health and Safety at Work regulations 1999, Regulation, a Competent Persons should oversee the health and safety.

3.4 Estates Operating Instructions

- 3.4.1 To comply with the Health and Safety at Work Regulations 1999 and related legislation, the Foundation work to a comprehensive list of operating procedures. The procedures for the Mill Hill Schools are detailed in Appendix 2. Cobham Hall will work to their existing policies, procedures and Risk Assessments.

3.5 Training

- 3.5.1 The Schools will comply with the Health and Safety at Work etc. Act 1974 and Management of Health and Safety at Work Regulations 1999 with respect to training.



- 3.5.2 Before entrusting any task to an employee, the Schools will take into account that employees' capabilities as regards appropriate health and safety to ensure the work demands do not exceed their ability to do the work without risk to themselves or others.

The Schools will provide employees with health and safety training:

- i. On recruitment: this induction training will give general health and safety information on the risks associated with the Schools' undertaking, including arrangements for Medical Support, Fire and Evacuation
- ii. On their being exposed to new or increased risks due to transfer or change of responsibilities or due to the introduction of new or changed work equipment or technology
- iii. Periodically as refresher training as appropriate
- iv. Records will be maintained of all training that has been given. The Foundation will appoint a responsible person co-ordinate training on each School's behalf

3.6 Accident Reporting

- 3.6.1 At the Mill Hill Schools, during term time all accidents that require medical attention, should be reported via the online System and the relevant School's accident reporting centre, namely at Mill Hill School and Mill Hill International the Foundation Medical Centre, at Belmont School the School Nurse, and at Grimsdell School the School Nurse.

- 3.6.2 At Cobham Hall, during term time all accidents should be recorded in an accident book, located in reception, and the School Nurse's Office. The form should then be sent to the School Nurse

- 3.6.2 The Schools, Cobham Hall Enterprises and Mill Hill School Enterprises will take all necessary steps to comply with the Reporting of Injury, Diseases and Dangerous Occurrences Regulations 2013.

- 3.6.3 Whenever any of the following events occur involving any person, except a pupil, it must be reported immediately to the Foundation Health and Safety Officer and in the case of a pupil it must be immediately reported to the Head of the School and as soon as reasonably practicable to the Foundation Health and Safety Officer:

- i. The death of any person as a result of an accident arising out of or in connection with work
- ii. Any person suffering any of the following injuries or conditions as a result of an accident arising out of or in connection with work
 - fractures, other than to fingers, thumbs and toes
 - amputations
 - dislocation of the shoulder, hip, knee or spine
 - loss of sight (temporary or permanent)
 - any injury likely to lead to permanent loss of sight or reduction in sight, such as a chemical or hot metal burn to the eye or any penetrating injury to the eye
 - injury resulting from electric shock or electrical burn (including any electrical burn caused by arcing or arcing products) leading to unconsciousness, or requiring resuscitation or admission to hospital for more than 24 hours
 - any crush injury to the head or torso causing damage to the brain or internal organs

loss of consciousness caused by asphyxia or exposure to a harmful substance or biological agent

- serious burns (including scalding) which:
 - covers more than 10% of the body
 - causes significant damage to the eyes, respiratory system or other vital organs
 - any scalping requiring hospital treatment
 - any other injury leading to hypothermia or heat-induced illness or unconsciousness, or which requires resuscitation or admission to hospital for more than 24 hours
 - acute illness requiring medical treatment where there is reason to believe that this resulted from exposure to a biological agent, its toxins or infected material
- iii. The person at work is incapacitated for his or her normal work for more than seven consecutive days (including the day of the accident) as a result of an injury ('over seven days') injury caused by an accident at work
- iv. Injury arising from physical violence at work, such as where a teacher sustains a specified major injury as a result of a pupil, colleague or member of the public assaulting him or her while at work
- v. The employee dies within one year of a reportable injury that leads to their death
- 3.6.4 In the case of death, specified injury or condition or a dangerous occurrence involving any person the Head of the School and the Foundation Health and Safety Officer must be notified immediately e.g. by telephone, and this must be followed up within seven (7) days by a written report to the Foundation Health and Safety Officer. The Foundation Health and safety Officer will make arrangements to ensure that the Health and Safety Executive is notified immediately by telephone and this will be followed up within ten (10) days by completing the HSE site online form.
- 3.6.5 In the case of over seven-day injury to a person at work, a written report must be sent to the Foundation Health and Safety Officer within seven days of the accident. The Foundation Health and Safety Officer will ensure the HSE online form is completed.
- 3.6.6 The Schools will keep records of all reportable injuries and dangerous occurrences containing the date and time of the accident causing the injury or the dangerous occurrence, and the following particulars about the person affected:
- Full name
 - Occupation
 - Nature of injury or condition
 - Place where the accident or dangerous occurrence happened
 - Brief description of the circumstances
- The Schools will keep the HSE copy of the online form
- 3.6.7 Maintenance of adequate accident records and the reporting of those necessary to the Foundation Health and Safety Officer will be the responsibility of the Mill Hill Schools Medical Centre and Cobham Hall School Nurse.
- 3.6.8 The Schools will arrange for all accidents and 'near misses' to be investigated to determine the need for any remedial action. The Foundation will also carry out longitudinal monitoring of accident data in order to spot any trends. The person responsible for deciding who shall carry out the investigation will be the Foundation Health and Safety Officer.

- 3.6.9 A written report on all accidents and 'near misses' investigated by the Schools will be sent to the Foundation Health and Safety Officer at Walker House within 6 days of the date of the accident or 'near miss'.
- 3.6.10 Where appropriate, a copy of the report will be made available for discussion at the next Court of Governors or Staff or Health and Safety Committee Meeting.
- 3.6.11 Currently the preferred method of reporting to the Health and Safety Executive is online. This may be done by:
 - i. via the HSE website [RIDDOR reporting](#)

3.7 Fire Risk: Evacuation

- 3.7.1 The Fire Risk Policy is a 'serious and imminent danger procedure' under the Management of Health and Safety at Work Regulations 1999. The Foundation has a Fire Risk Policy. Each School will establish its own Fire Evacuation and Fire Risk management procedures.
- 3.7.2 Once in every term, preferably within the first fortnight, the Schools will hold a fire drill, the timing of which will be notified in advance to staff. The Director of Operations will have the power to exempt certain staff from the drill.
- 3.7.3 If the Schools are not cleared completely in the minimum of time consistent with the difficulties inherent in the buildings, the drill will be considered inadequate and a further practice will be held until the satisfactory standard is achieved.
- 3.7.4 As regarding boarding houses, there will be practices once a term in a night-time situation organised and supervised by the Housemaster/Housemistress. A record will be kept of each fire practice.
- 3.7.5 A record will be kept of the date and time of every fire drill and the exact time taken to clear the buildings, and this data will be available to members of the Foundation Health and Safety Committee.
- 3.7.6 The warning, in case of fire, shall be given by a siren or bell that is not used for other purposes and can easily be recognised by staff and pupils and will be heard clearly in all parts of the buildings.
- 3.7.7 The fire alarm system will be tested weekly. The work will be done by the Maintenance Department or other designated person by the Schools and the testing will be done sequentially from one operating point to the next. Details will be kept of these tests.
- 3.7.8 Any person discovering a fire should immediately raise the alarm so that evacuation procedures may commence. Upon hearing the alarm, nominated staff will summon the Fire Brigade, inform the Head of the School and Foundation Health and Safety Officer and undertake whatever duties are specified in these Regulations.



- 3.7.9 Teachers are considered to be competent to implement evacuation procedures. All teachers in charge of the class will therefore be responsible for seeing that the whole class is evacuated safely along the designated evacuation route to the defined roll call area. In the event of an actual fire, any subsequent movement will be decided by the Heads and Foundation Health and Safety Officer, as appropriate.
- 3.7.10 The Heads will ensure that there is an effective system for ensuring that class registers current to that day are available for roll call.
- 3.7.11 The person responsible for informing the Fire Brigade will be the Senior Member of Staff present.
- 3.7.12 The person responsible for bringing out the registers will be the Senior Member of Staff present or a nominated Member of Staff.
- 3.7.13 Directions for the evacuation of pupils and others will be displayed in a prominent place in such areas as classrooms, common rooms, cloakrooms, prep rooms, offices, assembly halls, sick rooms, libraries, dining rooms, kitchens.
- 3.7.14 Arrangements will be made locally for all appliances using gas and electricity to be switched off and laboratory experiments rendered safe, as far as time and travel distance allow.
- 3.7.15 Exit doors leading from School buildings should never, under any circumstances, be locked or obstructed during School hours.
- 3.7.16 No unauthorised persons should re-enter the Schools, under any circumstances, during a fire practice or actual fire emergency.
- 3.7.17 In the event of an actual fire happening in any area or facility which is being used by outside organisations or the public, the Duty Manager of Mill Hill School Enterprises or the designated person at Cobham Hall will be responsible for ensuring the building is evacuated safely along the designated evacuation route and that people are accounted for in the designated place for that area.
- 3.7.18 The Duty Manager of Mill Hill School Enterprises will also be responsible for informing the Fire Brigade and the Foundation Health and Safety Officer.
- 3.7.19 Directions for the evacuation for the users of Mill Hill School Enterprise's facilities to be displayed in prominent places around the various buildings in use, e.g. swimming pool, sports hall, gallery etc.
- 3.7.20 The Duty Manager or other designated Staff Member of Mill Hill School Enterprises or Cobham Hall Enterprises, as appropriate, should ensure that no unauthorised persons re-enter the buildings under any circumstances, during a fire practice or actual fire emergency.

3.8 Fire Risk: Assessment

- 3.8.1 In compliance with the Regulatory Reform (Fire Safety) Order 2005, the Foundation will ensure that all non-residential and ancillary educational buildings are inspected by a competent person annually to assess fire risks at work. The minimum standard of risk assessment must be PAS 7 Fire risk assessment standard.



3.8.2 The Foundation will ensure that appropriate measures to reduce or prevent a risk identified in the written Fire Risk Assessment will be considered within its Planned Maintenance programme.


3.9 School Trips and Outings

3.9.1 It is the intention of the School to follow the guidance on safety during school visits published by the DfE.

3.9.2 A risk assessment will be conducted by the Trip Leader in each School before a trip or outing is organised at the Mill Hill Schools. A risk assessment will be carried out by the Deputy Head in consultation with the trip lead teacher at Cobham Hall.

3.9.3 The risk assessment will depend on the nature and duration of the trip or outing and will include assessment of the following factors where appropriate:

- Location
- Duration
- Nature of the activity
- Seasonal conditions or weather factors
- Competence, experience and suitable qualifications of supervisory staff
- Competence, age, maturity and fitness of the pupils

3.9.4 Permission for day trips are authorised by the Deputy Head, and those for residential trips (UK and International) are authorized by the Head before any announcement is made to pupils or parents. 

3.9.5 All relevant details of the trip or outing will be given to the EVC and the Head or Deputy Head of the School or member of the School SMT, as appropriate, who holds designated responsibility for trips or outings before departure. These details will include:

- Itinerary
- Addresses and telephone numbers of any outside agency involved, including travel agency, activity centre, coach Hire Company etc.
- List of pupil names and addresses and home telephone numbers

3.9.6 The Director of Operations will be consulted on matters of insurance and written confirmation of their satisfaction with insurance arrangements to be obtained for the Head.

3.9.7 The Director of Operations to be notified, by the heads of schools, the registration number of self-drive vehicle/s hired for trips or outings.

3.9.8 The detailed procedures and appropriate forms for completion for a trip or outing at each of the four Schools that comprise the Foundation are laid down in their respective 'School Staff Handbook'.

3.10 Minibuses

- 3.10.1 A School Minibus will not exceed 17 seats (16 passengers and a driver) in compliance with Part 111 of the road traffic Act 1991 and Motor Vehicles (Driving Licences) Regulations (Amendment) 2013.
- 3.10.2 The use of all school vehicles must comply with the contents of the Mill Hill Transport Safety Policy.
- 3.10.3 All School Minibuses will be checked by the transport manager every Monday and Friday during term time. Drivers of the Minibus will satisfy themselves of the safe working of the Minibus by a visual check that all equipment is working before commencement of a journey.
- 3.10.4 All minibuses have a section 19 permit and are checked by a competent professional every 10 weeks.
- 3.10.5 Drivers of the school minibus must provide this service on a voluntary bases and receive no payment other than the recovery of the out of pocket expenses.
- 3.10.6 Drivers of a School Minibus will be:
- salaried employees of the Foundation
 - 21 years of age or over and hold a category b licence for at least 2 years
 - All drivers must attend a MIDAS training course
 - They must have no more than 6 penalty point
 - Follow all rules and regulations from the DVLA
 - The gross minibus weight is not more than 3.5T or 4.25T of including any specialist equipment to carry disabled passengers. You must not tow a trailer in the minibus.

3.11 First Aid

- 3.11.1 The persons who have received training and have been appointed as First Aiders for the Schools, Mill Hill School Enterprises Ltd, Cobham Hall Enterprises and Walker House are listed in the First Aid Policy.
- 3.11.2 The First Aid training qualification is required to be renewed every 3 years and a refresher course undertaken every year.
- 3.11.3 First Aid Boxes are maintained and located as listed in the First Aid Policy.
- 3.11.4 The persons responsible for ensuring that First Aid boxes meet laid down statutory requirements are:
- Mill Hill School and Mill Hill International - Medical Centre Senior Nurse
 - Belmont School - Belmont Nurse
 - Grimsdell School - Grimsdell Nurse
 - Walker House - Medical Centre Senior Nurse
 - Mill Hill School Enterprises Ltd. - Medical Centre Senior Nurse
 - Cobham Hall and Cobham Hall Enterprises – Cobham Hall School Nurse

3.11.5 First Aid boxes in all areas to be checked against a stock list every 3 months and re-stocked as necessary.

3.11.6 The List of Contents of a First Aid Box is listed in the First Aid Policy.

3.12 Science Teaching

3.12.1 Experimental Safety: The method of conducting all experiments in the curriculum will be according to the standards laid out in the relevant 'Topics in Safety' published by the Association for Science Education. The chemicals used will be according to the recommended restrictions in Chapter 8 of the above publication.

3.12.2 Teachers are referred to CLEAPSS for advice and guidance, contained in publications such as Hazcards and the Recipe book as recognised by Ofsted and the HSE as the definitive basis for safe practice for practical work in schools.

3.12.3 Eye Protection: The Schools recognise that eye protection is a difficult matter. Note is taken of the guidance in Topic 5 of the above publication regarding acceptable kinds of eye protection. However, it is understood that complete protection for the pupils will be available only if box goggles manufactured to BS2092C or BSEN 166 are provided and worn.

3.12.4 Fume Cupboards: It is the policy of the Schools that fume cupboards will be tested once a year. This will conform to the 14-month requirement for the examination of engineering controls under the COSHH Regulations. The minimum standard required by the DfE (Building Bulletin 88, 1998) is a flow rate of 0.3M/sec with the sash fully opened. It is the aim of the Schools to achieve standards whereby the flow rate will be 0.5M/sec with the sash open at 0.5 metres.

3.12.5 Chemical Storage: It is the policy of the Schools that chemical storage will be along the general lines of that laid out in Topic 6 of the above publication. All chemicals stored on site will be kept in accordance with the Control of Substances Hazardous to Health Regulations 2002 (COSHH) regulations.

3.12.6 Microbiology: It is a policy of the Schools that all microbiological experiments will be assessed and categorised in accordance with Topic 15 of the above publication. The Schools will ensure that techniques and precautions appropriate to the level will be adopted as contained in Topic 15. The treatment of contaminated equipment, treatment of spillages and disinfection procedures will be in accordance with the above Topic chapter.

3.12.7 Radioactive Sources: It is the policy of the Schools to comply with the Ionising Radiations Regulations 2017 in full. The Schools will use the radioactive sources as required by the science curriculum, and will not carry out Independent experiment outside the standard syllabus. An examination of the Schools' activities indicate that instantaneous dose rates will not exceed 7.5 Sv/hr. The Director of Operations is required to appoint a Radiation Protection Adviser. The Head of Physics will be appointed as Radiation Protection Supervisor for the whole of MHS and the Head of Physics at Cobham Hall will be appointed as Radiation Protection Supervisor for Cobham Hall. The Head of Physics will be responsible for producing the Local Procedures for Using Radioactive Materials necessary under the Ionising Radiations Regulations referred to above. The Head of

Physics will be responsible for reviewing these procedures and monitoring their use. It is appreciated that matters relating to the application of the Radioactive Substances Act, possible exemptions regarding registration and the application of AM 1/92 is a complex matter. The Local Fire Authority will be made aware of radioactive sources held at the School and their location by the Head of Physics through the Deputy Head with delegated responsibility for Health and Safety who will inform the Director of Operations.

3.13 Combined Cadet Force

- 3.13.1 Combined Cadet Force activities on Foundation property are subject to the Foundation's Health and Safety Policy.
- 3.13.2 Combined Cadet Force activities in the Mill Hill School Shooting Range, Military Ranges and Camps are subject to the Ministry of Defence Health and Safety Policy.

3.14 Physical Education, Sports and Other Activities

- 3.14.1 Wherever possible the Schools' Health and Safety Policy will apply generally, but specifically the publication 'afPE Guide' is applicable.
- 3.14.2 Each School will establish appropriate Physical Education, Sports and Other Activities Codes of Practice and Policies.

3.15 Use of School Facilities by Members of the Public

- 3.15.1 The Foundation will ensure that all members of the public using the facilities of the Schools will be given sufficient information in order to allow them to avoid any risks to their Health and Safety.
- 3.15.2 The Mill Hill Schools and Mill Hill School Enterprises have established a written procedure for the Sports Centre setting out the organisation and arrangements for ensuring user safety as follows:
 - Sports Centre: Normal Operating Procedure
 - Sports Centre: Emergency Action Plan
- 3.15.3 With regard to the use of the Foundation's Residential Accommodation, this information will relate to means of escape in an emergency.
- 3.15.4 Any agreement form used by the Schools will carry a specific clause stating that the hirer will ensure adequate supervision and take responsibility for the Health and Safety of persons using the facilities.

3.16 Portable Appliance Testing

- 3.16.1 The Foundation has established a Portable Appliance Testing Policy.
- 3.16.2 The Foundation recognises that the Electricity at Work Regulations require Portable Appliance Testing ('PAT') are safety rules related to the use of electrical equipment. The Foundation will undertake regular testing of portable electrical equipment to ensure it is suitable and properly maintained to minimise risk

3.17 Laundry

3.17.1 The full terms of the Foundation Health and Safety Policy apply to the Laundry

3.18 Catering and Cleaning

3.18.1 The Mill Hill Schools Catering is under the management of the Domestic Bursar and is subject to the requisite Food Safety arrangements and the relevant Foundation and School policies. Cobham Hall catering is managed by the Cobham Hall Estates Manager.

3.18.2 The Mill Hill Schools Domestic Bursar or Cobham Hall Estates Manager, as appropriate, responsible for providing full allergen information to students, staff and visitors in accordance with Regulation EU 1169/2011. Training is also provided to catering staff regarding the management of allergen ingredients and the control of cross contamination.

3.18.3 Cleaning is under the management of the Domestic Bursar at the Mill Hill Schools and Cobham Hall Catering and Domestic Support Services Manager and is subject to the requisite cleaning safety arrangements and the relevant Foundation and School policies.

3.19 COSHH Regulations (Control of Substances Hazardous to Health Regulations 2002)

3.19.1 The Schools will take all necessary steps to comply with the above Regulations.

3.19.2 It is recognised that hazardous substances to which the Regulations apply will be used in examples such as, the teaching of Science, the teaching of Art, the teaching of Design Technology, the Offices, Maintenance, Domestic Cleaning and by the Ground Staff etc.

3.19.3 The Schools will establish and keep a folder in which will be listed the Data Sheets for each substance brought into the Schools, together with a written Assessment, where necessary, of the exposure of all persons who may use or be exposed to these substances.

3.19.4 The Schools will provide sufficient information to these persons so that they understand the principles of the Regulations and the precautions that need to be taken.

3.19.5 The Schools will undertake the appropriate statutory examinations of all engineering controls that are required by the Regulations.

3.19.6 The Schools will set up a system whereby the Director of Operations will be aware of any change in purchase policy so that new substances may be effectively monitored.

3.20 Electricity at Work Regulations

3.20.1 The Schools will take all necessary steps to comply with the Electricity at Work Regulations 1989, amended 2002.

3.20.2 The Schools recognise that they have to introduce a formalised system of maintenance for all electrical systems.

- 3.20.3 The Schools will ensure that fixed electrical installations are inspected and tested by a competent person at least every 5 years.
- 3.20.4 The Schools will prepare an inventory of all electrical apparatus used in the Schools and this will be routinely inspected and tested and an appropriate register kept. All such apparatus will be visually inspected at the start of each term and any defects rectified, where practical.
- 3.20.5 Pupils are responsible for the safe condition and use of all electrical appliances that they bring onto School premises (vide Standard Terms & Conditions 8(f)).
- 3.20.6 The Schools will ensure that any temporary systems e.g. stage lighting and control gear are inspected and tested by a competent person every 3 months. In addition, the Schools will ensure that fixed stage electrical installations are inspected and tested annually by a competent person, and following any changes, before being energised.
- 3.20.7 The Schools recognise that pupils must not be exposed to voltages in excess of 25 volts. Project work will be individually assessed for potential hazards and written instructions prepared to control the risks.
- 3.20.8 The Schools will ensure that electrically competent teachers or technicians will be involved where there is any possibility of a person, pupil or otherwise coming into contact with live conductors at voltages above 25 volts or where large short-circuit currents could flow.

3.21 Machinery Guarding and Work Equipment

- 3.21.1 It is the intention of the Schools that all machinery whether static or mobile, academic or maintenance, will be guarded, according to the relevant assessed risks, in accordance with the requirements of the Provision and Use of Work Equipment Regulations 1998 utilising guidance given in Booklet L22.
- 3.21.2 More specifically the matters of guarding will be those detailed in PUWER as interpreted in documents such as DATA, BS4163, CLEAPSS and other relevant standards with interpretation of the Standards being provided by the Schools' Health and Safety Consultants.

3.22 Abrasive Wheel Machines

- 3.22.1 The Schools utilise abrasive wheel grinders and will adhere to safety in the use of abrasive wheels HSG17 (third edition 2000). Under the Abrasive Wheel Regulations 1970, no person is allowed to mount any abrasive wheel unless he has been trained and is competent. Although these Regulations do not apply to Schools, the same standards will be adopted. The persons appointed by the Schools is: Telford Machine Tool Services.
- 3.22.2 Tool rests on abrasive wheel grinders are required to be adjusted as close as practicable to the exposed part of the abrasive wheel. All staff are expected to be vigilant and to carry out checks whenever they use a grinder and before pupils use a grinder and to carry out the necessary adjustments to the tool rests to ensure they are so maintained.

3.22.3 If eye shields are provided these must be kept in a clean and good condition.

3.22.4 Eye protection (EN 166) must be worn when abrasive wheel grinders are used.

3.23 Safety of Pressure System

3.23.1 The Schools will take all necessary steps to comply with the Pressure Systems Safety Regulations 2000.

3.23.2 The Schools recognise that the Regulations will apply to all pressure systems on site containing steam at any pressure, or a gas, or a liquid, or a mixture of both.

3.23.3 The Schools will use manufacturers literature and information available from their Competent Person who carries out current thorough examination and test pressure systems, to establish the safe operating limits of its pressure systems.

3.23.4 The Schools have a written scheme for the periodic examination of its pressure systems prepared by a Competent Person.

3.23.5 The Mill Hill Schools Estates Manager, or Cobham Hall Estates Manager as appropriate, will arrange for a Competent Person to carry out examination of the pressure system in accordance with the written scheme.

3.23.6 The Schools will provide adequate and suitable instructions to employees who have to operate pressure systems and this will include training, close supervision, provision of data and, if necessary, schematic or flow diagrams to help with the identification of important controls, valves etc.,

3.23.7 The Schools will ensure that the pressure systems are properly maintained in good repair so as to prevent danger.

3.23.8 The Schools will ensure that they keep the correct documentation. This documentation will consist of the following.

- ii. An initial report and examination of the pressure system by a Competent Person;
- iii. The last Report of examination of the pressure system made by a Competent Person;
- iv. Any other Reports if they contain relevant data to assist the safe operation, or referring to repairs and modifications;
- v. Information referring to data supplied by the designers or manufacturers.

3.24 Noise

3.24.1 The Schools are aware of the The Control of Noise at Work Regulations 2005 and where it believes that employees are exposed to noise levels that would designate the area as either Action Level 1 or Action Level 2 appropriate hearing protection will be provided and worn.

3.24.2 It is believed that these controls will be necessary in the following operations:

- i. Grass cutting operations;
- ii. Use of chain saws;

- iii. Use of all woodworking machinery;
- iv. Strimmers;
- v. Driving of tractors unless provided with Q cabs.

3.25 Manual Handling

- 3.25.1 It is the policy of the Schools to comply with the Manual Handling Operations Regulations 1992 [.HSE Guidance document L23](#)
- 3.25.2 In particular the Schools will:
 - i. Avoid the need, so far as is reasonably practicable, for employees to undertake any manual handling.
 - ii. Ensure all staff have suitable training in manual handling
 - iii. Where a manual handling operation cannot be avoided a suitable and sufficient assessment will be carried out by a responsible person.
 - iv. Take appropriate steps to reduce the risk of manual handling operation injury to the lowest level reasonably practicable, and provide employees with general indications of the weights of loads.

3.26 Personal Protective Equipment

- 3.26.1 It is the policy of the Schools to comply with Personal Protective Equipment at Work Regulations 1992 based on the guidance in Booklet L25.
- 3.26.2 The Schools recognise that Personal Protective Equipment is a last resort and that wherever possible, risks should be controlled by other means. Where the risks cannot be controlled by other methods or it is assessed that there is a residual risk, then suitable Protective Equipment will be provided to employees.
- 3.26.3 Where it is determined that Personal Protective Equipment is required then an assessment will be made to assess the risk, define the characteristics required of the equipment and compare these with the characteristics of the available equipment to ensure the equipment provided is suitable. The assessment will be recorded unless it can be easily repeated and explained.
- 3.26.4 All Personal Protective Equipment will be maintained and accommodation provided for it when it is not in use.
- 3.26.5 Employees will be informed, instructed and trained on the risks which the Personal Protective Equipment will avoid or limit; the purpose and manner in which the equipment is to be used and action they need to take to ensure it remains in good repair and efficient working order.
- 3.26.6 A record will be kept of all Personal Protective Equipment that is issued to employees.
- 3.26.7 The person nominated to co-ordinate the above on behalf of the Foundation is the Estate Manager.

3.27 Control of Legionellosis

- 3.27.1 The Foundation recognises that it operates hot and cold water systems where there is a risk of

Legionellosis and therefore requires control.

- 3.27.2 The Foundation will do all that is necessary to comply with the requirements of the Approved Code of Practice by identifying and assessing sources of risk, implementing and managing precautions and keeping records of precautions implemented.
- 3.27.3 The Foundation recognises that Legionella may colonise storage tanks, calorifiers, pipework and associated plant, including taps, showers and other appliances. In particular, it is recognised that Legionella is most likely to multiply in calorifiers where water temperatures are insufficiently high and in pipework leading to taps and showers.
- 3.27.4 The main objective of the Foundation is to operate water services at temperatures that do not permit the growth of Legionella and to avoid stagnation. The Foundation will also ensure that the system is clean in order to minimise the opportunity for bacterial contamination.
- 3.27.5 Where possible, water services will operate at temperatures that prevent the proliferation of Legionella, that is hot water storage (calorifiers, at 60°); hot water distribution at least 50° attainable at the taps with one minute of running; cold water storage and distribution at 20°C or below. Whilst it is recognised that water temperatures in excess of 50°C give rise to danger of scalding, and where necessary 'fail safe' thermostatically controlled mixing valves will be used to allow the hot water system to run safely at higher temperatures to control Legionella.
- 3.27.6 Where the above water temperatures cannot be maintained, weekly thermal disinfection of the system will be carried out. This will involve raising the temperature of the whole of the contents of the calorifier and then circulating this water throughout the system for at least an hour. Each tap and appliance will be run sequentially for at least five minutes at this full temperature.
- 3.27.7 It is recognised that if a calorifier or substantial part of the system is on stand-by operation, or if it is out of use for a week or longer for maintenance or other purpose, water will be raised to the operating temperature throughout for at least an hour before being brought back into use.
- 3.27.8 The following regime of routine inspection and maintenance will be established for the plant:
- Water temperatures at calorifiers will be checked monthly;
 - Water temperatures at taps after one-minute running will be checked at least annually;
 - Conditions in tanks for the presence of organic material, vermin etc., annually;
 - Conditions in calorifiers for the presence of organic materials and unduly build-up of scale, annually;
 - The condition of accessible pipework and insulation annually.
 - Water test sampling by a Competent Person will be undertaken during the Spring and Summer holidays and the October half term holiday.
- 3.27.9 The system will be cleaned and disinfected if routine inspection shows it to be necessary, if the system or part of it has been substantially altered or entered for maintenance purposes, or following an outbreak or suspected outbreak of Legionellosis.
- 3.27.10 The following records will be kept:

- A simple description and plan of the system identifying storage and header tanks, calorifiers and relevant items of plant;
- Details of risk assessment;
- Details of system operation relevant to controlling the risk, and the precautions to be implemented;
- Procedures for inspecting and checking the system;
- Details of precautions carried out.

3.27.12 The nominated officers with responsibility for ensuring this Policy is implemented is the Mill Hill Schools Estate Manager and Cobham Hall Estates Manager.

3.28 Swimming Pools

3.28.1 Introduction

3.28.2 The Foundation recognises that the use of its swimming pools gives rise to a number of hazards and that the following factors are relevant to potential accidents:

- Prior health problems e.g. heart trouble, asthma etc;
- Alcohol or food before swimming;
- Youth and inexperience (half of those who drown nationally are aged under 15);
- Weak or non-swimmers straying out of their depth;
- Unauthorised access to pools intended to be out of use
- Diving into insufficient depth of water
- Unruly behaviour and misuse of equipment
- Unclear pool water, preventing casualties from being seen
- Absence of, or inadequate response by, lifeguards in an emergency

3.28.3 The Schools and Mill Hill School Enterprises and Cobham Hall Enterprises have taken all of the above matters into consideration in establishing its Policy with regard to use of the pools.

3.28.4 Information to Bathers. The Schools and Mill Hill School Enterprises and Cobham Hall Enterprises have developed a Swimming Pool Users Safety Code and will ensure that the information contained in the Code is brought to the attention of all bathers. This will be achieved by one or more of the following methods:

- A notice displayed at the poolside
- References in contracts with club organisers, hiring the pool
- Oral reminders, where necessary, by poolside supervision

3.28.5 Written Operating Procedures. The Schools, Cobham Hall Enterprises and Mill Hill School Enterprises have established a written Operating Procedure setting out the organisation and arrangements for ensuring users safety namely:

- The Normal Operating Procedures for the Indoor Swimming Pool
- The Emergency Action Plan for the Indoor Swimming Pool

3.28.6 This will be brought to the attention of the Schools', Cobham Hall Enterprise's and Mill Hill School Enterprise's staff who use the pools and to club organisations that may hire the pools.

3.28.7 Swimming Teaching. The Schools, Cobham Hall Enterprise and Mill Hill School Enterprises will ensure that the necessary lifeguarding function is provided by those undertaking the teaching or coaching and that such persons will fulfil lifeguarding requirements.

3.28.8 The Schools and Mill Hill School Enterprises will take suitable account of the Department of Education and Science Booklet entitled 'Safety and Physical Education' during teaching activities.

- 3.28.9 Where a class has been arranged into groups in a pool, and where the distances involved do not enable a single swimming instructor to directly work with and act as lifeguard for more than one group, a second person trained to act as a lifeguard will also be present.
- 3.28.10 In the School swimming situation, the Schools, Cobham Hall Enterprises and Mill Hill School Enterprises will ensure that the instructor acting as a lifeguard will be able to take short breaks from concentrated observation of the water as one class leaves and another one enters.

3.29 Hire of Pool by Outside Organisations

- 3.29.1 The Schools, Cobham Hall Enterprises and Mill Hill School Enterprises will establish a contract with outside organisations who hire the pools which will include reference to safety arrangements.
- 3.29.2 The Schools, Cobham Hall Enterprises and Mill Hill School Enterprises will almost exclusively expect outside organisations to provide appropriate poolside supervision although as the pool operator, the Schools and Mill Hill School Enterprises will ensure that they take reasonable steps to ensure that the arrangements for safety, agreed with the hirers, are implemented.
- 3.29.3 This will be achieved by occasional checking of such activities to ensure that agreed supervision is being provided and that any agreed rules of behaviour are being observed.
- 3.29.4 Emergency Arrangements. The following emergency arrangements will be available:
- A poolside telephone to summon help in an emergency
 - Suitable rescue equipment including poles or life belts will be available by the poolside and clearly identifiable
 - Whenever the pool is in use, a nominated member of staff should be designated as 'on call' to deal with any emergency. Such person should be trained in rescue, resuscitation and first aid
- 3.29.5 Lifeguards employed by the Mill Hill School Foundation, Cobham Hall Enterprises Mill Hill School Enterprises will be RLSS or NARS qualified.

3.30 Managing Asbestos

- 3.30.1 The Foundation will comply with the Control of Asbestos Regulations .2012 [hse.gov.uk/asbestos](https://www.hse.gov.uk/asbestos).
- 3.30.2 Where asbestos exists, or is suspected, in any of the Foundation properties a full survey and Risk Assessment shall be conducted via the Mill Hill Schools Estates Manager, or Cobham Hall Estates Manager as appropriate. Records of findings shall be kept within the Mill Hill Schools Estates Office and Cobham Hall Estate Manager's Office.
- 3.30.3 The Foundation has a comprehensive asbestos management policy and plan that describes how asbestos is managed throughout the estate. Information on the location of asbestos containing materials is held within an asbestos register. There are controlled copies of the asbestos register in the Mill Hill Schools Estates Office and Cobham Hall Estate Manager's Office.

- 3.30.4 If asbestos is suspected or discovered, work must immediately cease in the area which should then be isolated. The Maintenance team should be called immediately. On no account should work continue within the area. The area must be secured to prevent any persons entering it and all work equipment and clothing must remain in the affected area.
- 3.30.5 The Foundation will then take appropriate steps to ensure the risks from asbestos are minimised and the asbestos is dealt with in accordance with the Foundations asbestos management plan.
- 3.30.6 Details of the asbestos shall be made available to all interested parties and contractors via the Mill Hill Schools Estates Manager or Cobham Hall Estates Manager as appropriate.
- 3.30.7 Where asbestos exists, hazard warning signage will be displayed via the asbestos labelling system.
- 3.30.8 All contractors and relevant employees have received asbestos awareness training which will be refreshed regularly.
- 3.30.9 At the Mill Hill Schools any potential incidents involving asbestos are to be reported using the Every incident report form and an asbestos exposure record made. At Cobham Hall, they will be reported to the Estates Manager and then on to the Director of Operations
- 3.30.10 There are managed asbestos-containing materials in various locations within certain buildings. No-one should fix anything directly to wall surfaces or otherwise breaking into the structure unless asbestos information has been checked first with the Mill Hill Schools Estates Manager or Facilities Manager or the Cobham Hall Estates Manager as appropriate.

3.31 Mobile Access Towers

- 3.31.1 A Foundation employee responsible for the erection and use of a Mobile Access Tower will have undertaken training and hold a certificate of competence issued by the Competent Person appointed for training.

3.32 Disclosure and Barring Service

- 3.32.1 The Foundation is a Registered Body with Carecheck for the Disclosure and Barring service for the purposes of obtaining access to criminal record checks for employment and voluntary appointments. For the Foundation's safeguarding procedures see Policy for the Safeguarding of Pupils who are children at the School.
- 3.32.2 The Foundation believes it to be of fundamental importance to ensure as far as possible that those who take up appointments in the Foundation do not pose a risk to the children in its care. The Foundation will apply for and review the past criminal records of any successful applicants for positions as an essential part of its recruitment process.
- 3.32.3 The Foundation will require Enhanced Disclosure with Barred List check for its employees and voluntary appointments unless an Enhanced Disclosure or Standard Disclosure is deemed to be appropriate for the appointment.

3.32.4 In accordance with the Code of Practice the Foundation will comply with the Disclosure and Barring Service guidelines covering:

- The retention period of Disclosure information and any associated correspondence,
- The storage and security of Disclosure information and other confidential documents issued by the Disclosure and Barring Service,
- The destruction of Disclosure information and any associated correspondence,
- Keeping the record of a Disclosure.

3.33 Ground Staff

3.33.1 All staff who use chain saws, strimmer's or similar equipment will be provided with hearing protection, visors, safety footwear and the correct ballistic clothing. They will have been on a chain saw training course and work will proceed according to the current HSE Guidance Note PM31.

3.33.2 All pesticides will be safely and securely stored and will be under lock and key except when being manipulated. The person responsible for the spraying of pesticides will have been on a course approved under the Control of Pesticides Regulations 1986 and will hold a certificate of competence issued by the National Proficiency Tests Council, Tel. No. 0207203 696553.

3.34 General Instructions for Contractors

3.33.1 The Foundation's Liaison Manager for Contractors is the Estates Manager or his representative who must be contacted before any work is commissioned or commenced.

3.33.2 The Foundation will require Contractors to report to Walker House daily throughout the Contract period both before commencing work on Foundation premises and on completion of work, unless alternative special arrangements have been agreed with the Estates Manager or his representative.

3.33.3 The Foundation will require Contractors to wear Foundation Identity Cards when at work on Foundation premises unless it is a Health and Safety hazard to do so. The Identity Cards will be issued daily by Walker House for projects at the Mill Hill Schools or the School reception at Cobham Hall, as appropriate,, unless alternative special arrangements have been agreed with the Mill Hill Schools Estates Manager, Cobham Hall Estates Manager or their representative.

3.33.4 The Foundation will require Contractors to provide satisfactory evidence of insurance cover in respect of their legal liabilities to the Foundation, third parties, and their own employees. It will be a condition of Contract that the Main Contractor assumes legal liabilities to the Foundation and third parties which may be occasioned through the actions of any sub- contractor or other body employed or engaged by the Main Contractor or his representative up to £5 million unless otherwise specified.

3.33.5 Unless specifically agreed in writing with the Contractor, orders will be placed on the basis that the Contractor shall provide all equipment, including ladders, trestles, tools, scaffolding and any necessary protective clothing and equipment for their employees. The use of Foundation equipment such as lifting equipment, tools, electrical supplies and access equipment is prohibited unless specifically authorised by the Mill Hill Schools Estates Manager, the Cobham Hall Estates Manager or the Director of Operations.

- 3.33.6 Contractors are not permitted to engage the assistance of Foundation personnel without the specific authorisation of the Mill Hill Schools Estates Manager, the Cobham Hall Estates Manager or the Director of Operations.
- 3.33.7 When a Contractor uses scaffolding or other access equipment on site he must ensure that it complies with the Construction Regulations. Scaffolding inspections, in accordance with the Construction (Design and Management) Regulations 2015, are the responsibility of the Contractor.
- 3.33.8 The Contractor is responsible for seeing that any sump, pit or other excavation caused or worked on is securely fenced as required by the Construction Regulations.
- 3.33.9 The Contractor shall ensure by proper boarding, shuttering or other means the protection from damage of any property of the Schools or other person's property adjoining the site.
- 3.33.10 No Contractor or Contractor's employee is permitted to interfere with or operate any valve, tap, switch or plant control without the specific authorisation of the Estates Manager, The Cobham Hall Estates Manager or the Director of Operations.
- 3.33.11 Contractors are reminded that, under the Electricity at Work Regulations 1989, amended 2002, Regulation 14, no work activity should be carried out on, or near, any 'live' conductor unless it is unreasonable, having regard to all relevant factors, for the equipment to be 'dead' while work proceeds; and that it is reasonable for the work to be carried out on or near it while it is 'live'; and suitable precautions are taken to prevent injury.
- 3.33.12 When portable electrical equipment is brought on to the Foundation site, this is expected to be of 110-volt centre-tapped supply unless otherwise specifically authorised by the Estates Manager, the Cobham Hall Estates Manager or the Director of Operations. All cables and extension leads are to be in good condition, properly maintained and terminated.
- 3.33.13 All gas welding or flame cutting equipment brought on to site is expected to be fitted with flashback 'arrestors', and proper arrangements are to be made by the Contractors for securing of cylinders while on site. This applies both to gas cylinders which are in use and spares. Cylinders which are not secured to a trolley should be tied back to a frame or other support to avoid damage to valves.
- 3.33.14 Before commencing 'Hot Work Cutting' contractors should be issued with a Hot Work Permit from the Mill Hill Schools Estate Manager or Cobham Hall Estates Manager, as appropriate.
- 3.33.15 The site includes areas of high fire risk which are identified by appropriate signs. The ban on smoking and naked lights in these areas is rigidly enforced and Contractors must be vigilant in observing these conditions.
- 3.33.16 Any accidents that occur on the Foundation site must be reported to the Director of Operations as the Foundation Health and Safety Officer. The Foundation expects the co-operation of Contractors in the investigation of any accidents that may occur.



- 3.33.17 Contractors are required to advise the Mill Hill Schools Estates Manager, the Cobham Hall Estates Manager or the Director of Operations where they will be working on the Foundation site and should not go into any other areas of Foundation property without prior authorisation from the Director of Operations.
- 3.33.17 The Contractor will inform the Director of Operations as the Foundation Health and Safety Officer the Mill Hill Schools Estates Manager or Cobham Hall Estates Ma of the health hazards of any substances he brings on to the Foundation site, the likely exposure risks to Foundation employees, pupils and their parents and other visitors, and any precautions that need to be followed.
- 3.33.18 Any queries or problems on the Mill Hill Schools site should be referred to the Estates Manager. They should be referred to the Cobham Hall Estates Manager at Cobham Hall.
- 3.33.19 The Director of Operations as the Foundation Health and Safety Officer the Mill Hill Schools Estates Manager or Cobham Hall Estates Manager will make contractors aware of the Fire Precaution arrangements for the School and location of Assembly Points for fire evacuations.

3.34 Lifts and Hoists

- 3.34.1 The Foundation will comply with the Provision and Use of Work Equipment Regulations 1998 and (LOLER) The Lifting Operations and Lifting Equipment Regulations 1998.
- 3.34.2 The Estates Manager has the responsibility for the appointment of the competent person to carry out the thorough examination and testing and to ensure action is taken when faults are verified.
- 3.34.3 The Foundation recognises its duty to:
- take reasonably practical measures to ensure the safe use of lifts and hoists
 - to appoint a Competent Person to undertake a 'thorough examination' six times per annum to comply with The Lifting Operations and Lifting Equipment Regulations 1998 regulation 9
 - to maintain a record of inspections and thorough examinations for at least two years in accordance with The Lifting Operations and Lifting Equipment Regulations 1998 regulation 1

3.35 Gas

- 3.35.1 The Foundation will comply with The Gas Safety (Installation and Use) Regulations 1998.
- 3.35.2 The Foundation recognises its duty to:
- maintain gas fittings and flues in a safe condition in accordance with Regulation 36 (2)
 - ensure an annual inspection by a Competent Person of each gas appliance and flue in accordance with Regulation 36 (3)
 - to retain a record of each inspection for two years in accordance with Regulation 36 (3)

3.36 Waste Disposal

- 3.36.1 The Foundation will arrange for collections of waste to comply with the Environmental Protection Act 1990, the Environmental Protection (Duty of Care) Regulations 1991 by appointing a Competent Person to dispose of the Foundation's waste.

3.37 Design and Technology Teaching

- 3.37.1 The Foundation recognises the best practice recommendations made in BS4163:2014 'Health and Safety for Design and Technology in Schools and Similar Establishments – Code of Practice'.
- 3.37.2 The Head of Department will:
- i. Carry out a formal review, at least once each term to ensure that the preventative and protective measures (*as identified by General Risk Assessments and PUWER compliance checks*) in place remain effective. Such a review will be part of monitoring procedures put in place by the Head and Director of Operations
 - ii. Ensure that all teaching and support Staff are trained in the safe use of equipment, machinery and processes. This training should be to the standards approved by the Teacher Training Agency and published by The Design and Technology Association (Health and Safety Training Standards in Design and Technology) and be updated at least every 5 years
 - iii. Ensure the safe and proper storage of all materials, projects, hazardous substances, flammable liquids, tools etc.
 - iv. Ensure that access to the Department by pupils is prevented and that the key to the key-operated electrical supply is withdrawn and retained by a responsible person whenever a competent qualified member of Staff is not present
 - v. Make arrangements to ensure that the more hazardous power-operated equipment which is necessarily restricted to teaching or support Staff use only, is isolated from the power source and padlocked in the "OFF" position at all times except when immediately in use
 - vi. Can demonstrate the decisions made on which machinery is suitable for use by each group of pupils and which should be based, amongst other factors, on pupil maturity and competence, the level of supervision, the type and level of risk associated with the machinery
 - vii. Make arrangements to ensure all (LEV) Local Exhaust Ventilation systems are subject to weekly visual inspections to verify that the basic operational features are functioning correctly. The fourteen (14) monthly Thorough Examination (carried out every 12 months) is arranged through the Estate Manager.

3.38 SENDA

- 3.38.1 The Foundation will comply with SEN and Disability Discrimination Act 2005, the Equality Act 2010, the Children and Families Act 2014 and the revised SEND Code of Practice in application.
- 3.38.2 The Foundation has established a written Disability Policy and Accessibility Plan and a SEND Policy for the Mill Hill Schools and separately for Cobham Hall which are available on request from the Deputy Head with delegated responsibility for Health and Safety, in relation to the Mill Hill Schools or Cobham Hall Estates Manager in relation to Cobham Hall.
- 3.38.3 All employees are responsible for informing the Director of Operations through the Deputy Head with delegated responsibility for Health and Safety of any potential Health and Safety issues arising

from the SEN and Disability Discrimination Act 2005, the Equality Act 2010, the Children and Families Act 2014.

3.39 Lone Working

- 3.39.1 All staff working in isolation must ensure they are aware of the contents of the generic lone working risk assessment.
- 3.39.2 Where circumstance fall outside of this assessment a specific lone working risk assessment should be completed for the department where necessary

3.40 Safety Signs

- 3.40.1 Where a hazard cannot be completely eliminated, it will be reduced by the use of a safety sign
- 3.40.2 Safety signs will be monitored and reviewed regularly by the Estate Team. All defects should be reported via maintenance request system

3.41 Slips Trips and Falls

- 3.41.1 Potential slip, trip or fall hazards will be monitored by the Health and Safety Coordinator and all relevant departments
- 3.41.2 All employees must report hazards of which they become aware. Identified issues will be prioritised based on their seriousness and their location
- 3.41.3 Footpaths and external areas will be checked regularly to ensure they do not become slippery due to moss
- 3.41.4 Employees working off site should report any slip, trip or fall hazards that they cannot deal with to the person in control of the site from which they are operating

3.42 Disaster and Emergency Planning

- 3.42.1 The Foundation has a Critical Incident Response and Recovery Plan (CIRRP), together with a Critical Incident Policy and Emergency Plan for the Mill Hill Schools and Disaster Recovery Plan for Cobham Hall. This include procedures to deal with a crisis in the event of a disaster to Property, Supplies and Services etc. Crisis Management Procedures have been established for each School as set out in the Policies.