

**United Learning Health and Safety Policy,
Statement of Intent, Organisation and Arrangements for**



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1. Scope

- 1.1. This document is United Learning's Health and Safety Policy. It is applicable to all schools and settings operated by United Learning Ltd and all persons employed by its subsidiaries.
- 1.2. The purpose of this document is to address United Learning's strategic risk relating to compliance with - health and safety legislation, sector specific guidance and the principles of good governance, as follows:
 - Statutory duties with specific focus on matters covered by The Health and Safety at Work etc Act 197, its subsidiary regulations, and the Regulatory Reform (Fire Safety) Order 2005.
 - DfE's 'Academy Trust Handbook' and 'Academy Governance Guide', and ISI's Framework for independent school inspection
 - Sector guidance published by DfE, including their online collection of guidance documents, 'Health and Safety in Schools'.
 - And with reference to the principles outlined in BS ISO 45001 'Occupational Health and Safety Management Systems' (Note the Group is not certified to 45001, but the principles of the standard help develop a framework for effective health and safety management).
- 1.3. The objective of this policy is to ensure that all employees, at all levels, understand their responsibilities and United Learning's expectations in relation to the management of health and safety of staff, pupils, visitors, contractors etc.
- 1.4. The delivery of an effective safety management system requires buy-in and commitment at all levels. It is expected that United Learning employees will exhibit exemplary professional behaviours that in turn deliver a health and safe environment, for all stakeholders (colleagues, pupils, parents etc).
- 1.5. This Policy comprises a Health and Safety Policy Statement, and details on the organisational responsibilities and arrangements for health and safety.

2. Relationship to United Learning's Strategic Objectives

- 2.1. United Learning's Strategic Objectives to 2026 are:
 - Great places to learn
 - Great places to work
 - A Great group to Join
 - A Great contribution beyond the group
- 2.2. Robust health and safety management is foundational to all of these objectives. We cannot be great contributors beyond the group unless we are great in all other areas as well, and we cannot be great places to learn or work, or great schools to join if our buildings pose risks to health and safety, or our staff are not competent and confident in the roles they perform.



3. Health and Safety Statement of Intent 2025-26

The **Trustees of the Group Board** recognise and accept their responsibility, as the employer for all United Church Schools Trust (UCST) and United Learning Trust (ULT) employees, to provide workplaces and work practices which are safe and healthy for employees, pupils, and visitors - including contractors or anyone else who might be affected by our operations.

In all schools, the day-to-day responsibility for health and safety rests with the **Head Teacher** with operational oversight delegated to a named **Health and Safety Coordinator**. At central office, the **Executive Team** share this responsibility. Each school has a **LGB Representative for Health and Safety** who represents the Local Governing Body at the school's termly Health and Safety Committee meetings and reports to the local governing body on matters of health and safety.

The **Chief Financial Officer** is the Executive with responsibility for health and safety compliance. A **Head of Health and Safety** is appointed to assist the Chief Financial Officer in fulfilling their responsibilities.

Trustees are especially mindful that exposure to risk is an essential part of the education process. **United Learning** is committed to providing a learning environment that, whilst not unduly hazardous, provides all students with a stimulating experience that equips and prepares both children and young adults for life in the real world.

It will:

- Ensure health and safety risks are identified, assessed and appropriately controlled.
- Take all reasonable steps to ensure a safe environment with adequate welfare facilities.
- Ensure competent advice with regards health and safety management, including where necessary any external specialist advice.
- Provide adequate resources to ensure the Health and Safety Policy is implemented effectively.
- Provide suitable and sufficient information, instruction and training to ensure safe working practices.
- Prevent accidents and cases of work-related ill health, and where they do occur ensure they are appropriately investigated to learn lessons and prevent a recurrence.
- Have procedures in place to effectively deal with emergencies for example fire and other significant events.
- Ensure consultation with employees and their representatives on matters of health and safety.
- Ensure appropriate monitoring and review of health and safety arrangements to ensure health and safety objectives are met and continual improvement in health and safety performance.



Sir Jon Coles

Chief Executive Officer



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Organisational Responsibilities

1. Overview

- 1.1. This section details the organisation of health and safety roles and responsibilities across all employee groups and for specific roles where relevant.

2. Trustees and Executive Officers

- 2.1. The ultimate responsibility for health and safety at United Learning is vested in the Group Board. The Trustees and Executive Officers are responsible for ensuring that managers are aware of and fulfil their responsibilities for health and safety.

- The Trustees will hold the Chief Executive Officer and Executive Officers to account for their performance with the duties under this Policy
- Trustees and Executive Officers will embody a positive health and safety culture in all their actions and decision-making processes.

- 2.2. The Chief Financial Officer is the Executive Officer nominated as responsible for health and safety, reporting directly into Trustees and the rest of the Executive team via the Group Board. They will:

- Ensure the health and safety management system is effective at all levels of the organisation
- Demonstrate health and safety leadership at executive and operational level and ensure that all those with managerial responsibility are effectively managing health and safety, wherever they operate within the group
- Appoint and manage the Director of Estates and Head of Health and Safety
- Provide senior level direction for the Director of Estates and the Head of Health and Safety Report to the Executive Team and Trustees on the performance of health and safety across United Learning
- Ensure that the Executive Team and Trustees are made aware of any significant health and safety issues that cannot be dealt with at school or central office level, or which will have an immediate or sustained impact on school operations.

3. Regional Directors

- 3.1. Regional Directors will:

- Hold their Head Teachers to account regarding their school's H&S performance
- Ensure health and safety performance and issues are discussed when meeting with the head/principal.

4. Director of Estates

- 4.1. The Director of Estates is responsible for the oversight of the group's estate (schools and central office) to ensure their safe and suitable condition. Modifications or alterations to



school premises may only be carried out in line with Estates Policies or with written approval from the Director of Estates or a suitable nominated member of their team.

4.2. The Director of Estates will:

- Ensure United Learning's estate portfolio is appropriately designed and well maintained, and without significant risks to health or safety, so far as is reasonably practicable
- Ensure all building projects, renovations, and repurposing of buildings or premises, consider health and safety matters at the design stage

5. Head of Health and Safety

5.1. United Learning's Head of Health and Safety has responsibility for the development and implementation of the group's health and safety management system (policies and procedures), to include:

- Developing and publishing health and safety policies and codes of practice
- Developing and publishing guidance documents to aid all sites in meeting the requirements of the group's policies or codes of practice
- Developing and implementing systems and processes for the measurement and/or monitoring of health and safety performance, both in schools and across the group as a whole
- Overseeing contracted health and safety related services, such as the Radiation Protection Officer scheme and group memberships, such as with CLEAPSS for science and design & technology advice and AfPE for PE
- Providing advice and support to all schools and central office departments where required
- Investigating significant accidents or health and safety incidents at central office locations and schools
- Promoting a positive health and safety culture across all Group operations
- Reporting to the Trustees, via the Chief Financial Officer, on the above or any current or emerging health and safety issues that may have a significant impact on the Group.

6. Executive Business Managers

6.1. Where there is an Executive Business Manager (EBM) in post, they serve as the health and safety link between central office and the cluster's schools. The EBM will:

- Provide oversight of the implementation of this Policy at school level and ensure it is fully embedded, along with the expectations detailed in the group codes of practice
- Attempt to advise and resolve health and safety queries originating from within their cluster's schools and escalate to the Head of Health and Safety where these cannot be resolved locally

6.2. EBMs cannot delegate these responsibilities. They may, however, delegate the implementation of these requirements to other cluster or school-based staff where this



delegation is to a person(s) with the necessary competencies and authority to carry out these tasks. Any such delegation will be clearly recorded in writing.

7. Head Teachers/Principals/Nursery Managers

7.1. All head teachers/principals and nursery managers (where operating standalone) within United Learning have control of the day-to-day operations of their school and are directly responsible for the following:

- Ensuring compliance with this Policy and associated group codes of practice
- Ensuring that the necessary resources for implementation are available for all health and safety functions to be adequately fulfilled, so far as is reasonably practicable
- Ensuring that departmental heads/leads have the necessary competences to allow health and safety duties to be competently discharged
- Attending the school Health and Safety Committee meetings
- Reporting to central office on health and safety matters as required by the Head of Health and Safety
- Promoting a positive health and safety culture across all school operations

7.2. The following duties may be delegated to individual members of staff (in school or at cluster level) but the head teacher/principal/nursery manager retains the responsibility for their fulfilment.

- Implementation of the requirements of this policy and the associated group codes of practice
- Plan, organise, control, monitor and review arrangements for the health and safety of employees, pupils, visitors including contractors, and any others who may be affected by our work activities
- Assess risks, commit the significant findings to writing, and act upon these findings
- Ensure that work in all its aspects is safe and without risks to health, so far as is reasonably practicable
- Ensure that sufficient information, training, instruction, and supervision is provided to staff
- Record on the Group Accident Reporting and Management System (ARMS) all accidents, and other qualifying events, and investigate with a view to preventing a reoccurrence as appropriate
- Appoint an adequate number of suitably trained first aid personnel

8. Health and Safety Coordinators

8.1. Each school is required to appoint a Health and Safety Coordinator and deputy Health and Safety Coordinator. Where a school is part of a cluster and there is cluster oversight of H&S in place, such as via the EBM, only one coordinator is needed in each school in the cluster.

8.2. It is the H&S Coordinator's role to:



- Be familiar with the contents of this policy and the associated H&S Codes of Practice and bring them to the attention of employees as relevant
 - Ensure that this policy is reviewed at least annually, shared with all employees, and that a copy is provided to the Head of Health and Safety following any changes and at least once per academic year
 - Support departmental heads/line managers in identifying health and safety training needs in their departments
 - Monitor that line managers prepare and review local management arrangements, prepare and review risk assessments and carry out thorough examinations, test and inspections as applicable to their departments
 - Monitor that accidents and other qualifying events are reported and investigated and uploaded to the Group's Accident Reporting and Management System (ARMS)
 - Monitor school H&S performance, bringing any matters of concern to the attention of the head teacher/principal and/or Executive Business Manager, as appropriate
 - Liaise with enforcing and inspecting bodies as appropriate
 - Act as clerk to the school's health and safety committee
- 8.3. To ensure the position carries sufficient authority to discharge the duties above and for the purposes of the promotion of a positive safety culture, the lead Health and Safety Coordinator in each school will be a member of the senior management team unless the school is part of a cluster (see 8.5)
- 8.4. Where the school is part of a cluster, the Health and Safety Coordinator(s) will work closely with the Executive Business Manager, or other Cluster Lead as necessary for the purposes of health and safety compliance, serving as the day-to-day point of contact for health and safety matters arising in school. Where any of these Health and Safety Coordinator duties are transferred to cluster level, this division of responsibilities will be formally recorded.

9. Local Governing Bodies

- 9.1. All local governing bodies and their members will operate in accordance with this policy and the United Learning LGB Handbook.
- 9.2. LGB members hold no direct accountability or responsibility for health and safety matters, but they should use their authority as the school's 'critical friend' to challenge and support the development of health and safety performance and culture in their school.

10. LGB Representative for Health and Safety

- 10.1. It is a requirement of the United Learning LGB Handbook that each school's LGB has a member who oversees health and safety performance. Functions include:
- Attending the school's Health and Safety Committee meetings
 - Fulfilling the 'critical friend' role to challenge and support the work of the head teacher



- Liaising regularly with the school's Health and Safety Coordinator on issues, risks and general H&S performance

11. Line Managers (including Heads of Department/Faculty Leaders)

- 11.1. All employees within United Learning who hold a line management position are directly responsible for:
- The health, safety, and welfare of those employees who report to them
 - Inducting new members of staff to their department and the relevant emergency arrangements
 - Ensuring those under their management have completed health and safety induction training and are competent to carry out their role
 - Identifying health and safety training needs of their employees at appraisal or when such matters come to their attention at any other time
 - Carrying out risk assessments for activities under their control, documenting the significant findings as relevant, acting upon these findings and keeping these assessments under review.
 - Attempting to resolve any health, safety, or welfare issues affecting their employees
 - Notifying their school's Health and Safety Coordinator of any health, safety, or welfare issues that they are unable to resolve locally

12. Trade Union Appointed Safety Representatives

- 12.1. United Learning recognises the following trade unions:
- Academies Support staff - GMB and Unison
 - Teaching staff - ASCL, NEU, NAHT, and NASUWT
- 12.2. Each trade union has the authority to appoint health and safety representatives.
- 12.3. Further information on trade union appointed health and safety representatives is contained in the *Consultation (HS) – Code of Practice*.

13. Non-trade union appointed Safety Representatives

- 13.1. Those employees who are not members of a recognised trade union remain entitled to be consulted on health and safety matters. This can be directly, or through the election of health and safety representatives.
- 13.2. Further information on non-trade union appointed health and safety representatives, their role, and functions is contained in the *Consultation (HS) – Code of Practice*.

14. Employees

- 14.1. All United Learning employees are directly responsible for:
- Taking reasonable care for the health and safety of themselves and of other persons who may be affected by their acts or omissions



- Cooperating fully with their line manager or other responsible person on all matters pertaining to their health and safety at work
- Not recklessly or intentionally interfering with, or misusing any equipment, safety devices etc that have been provided in the interests of health and safety at work
- Reporting promptly, in the first instance to their line manager, any accident, injury, significant near miss, incident of violence and aggression or case of work-related ill health
- Reporting to their line manager, any defect, hazard, damage or unsafe practices or other items that could give rise to an unsafe place of work or cause injury or ill health to others
- Wearing any protective clothing or equipment and using any equipment that has been provided for their health and safety while at work
- Observing safety rules, complying with this policy, group codes of practice, and adhering to safe working procedures at all times
- Acquainting themselves, and complying with, the procedure to follow in case of a fire or other emergency
- Challenging any unsafe acts or conditions that they see. If they feel that any task allocated to them is unsafe, they may stop work, and raise their concerns with their line manager
- Showing respect for fellow workers and managers by accepting constructive intervention in a positive manner when any member of staff, regardless of position, takes action to stop an unsafe act



Arrangements for Health and Safety

1. Overview

- 1.1. The arrangements for the implementation of this health and safety policy are outlined below. They are categorised into three broad groupings - Management, Premises, and Operations.
- 1.2. Supplementing the actions identified in this policy, United Learning (as the employer) has produced a series of 'Codes of Practice' (COPs) which are stored on the Health and Safety pages of United Hub (corporate intranet).
- 1.3. These COPs provide further operational guidance on the areas given below. They support the flexibility associated with local autonomy/decision making and define United Learning's minimum expectations for key risk areas. Schools can and are indeed encouraged to go beyond group these expectations where this will have a meaningful impact on employee health, safety, or welfare.

Management Arrangements

2. Accidents

- 2.1. ARMS is United Learning's 'Accident Reporting and Management System'. It is hosted on United Hub and serves as the group's de facto accident book. It is used for the recording of accidents, dangerous occurrences and occupational diseases (matters covered by the Reporting of Injuries Diseases and Occupational Diseases Regulations (RIDDOR) 2013).
- 2.2. All employees have the ability to create records and registered superusers can monitor and report on their school(s) data. Events of potential significance are automatically escalated to the Head of Health and Safety for consideration and reporting under RIDDOR if required.
- 2.3. At Embley the nominated superusers are Claire Brighton and Helen Gale.
- 2.4. Embley follows the guidance outlined in United Learning's *Accident Management – Code of Practice*.

3. Consultation

- 3.1. Embley undertakes to consult with its workforce on any matters that may affect their health and safety, either directly or through trade union appointed safety representatives or representatives of employees, as applicable.
- 3.2. United Learning will consult with schools on any material changes to this policy and its overarching arrangements.
- 3.3. Embley follows the guidance outlined in United Learning's *Consultation (HS) – Code of Practice*.

4. Communication

- 4.1. While this policy may be viewed by pupils, parents and third parties, its primary audience is the setting's employees as it provides them with the information necessary to allow them to



understand local arrangements for health and safety management and the expectations placed upon them with regards to their individual health and safety duties.

- 4.2. These arrangements for health and safety are only effective if they are clearly communicated to employees. To that end, Embley shares this policy with all staff at the beginning of each year, and again at any other time where a material change has occurred.
- 4.3. United Learning will clearly communicate to schools/settings any changes to the this policy or the accompanying codes of practice. Termly Teams updates are also provided for School Health and Safety Coordinators and LGB Representatives for Health and Safety.

5. Departmental Policies (secondary settings only)

- 5.1. In recognition of the higher risks associated with these departments, Science, Design and Technology (incorporating food tech, art and textiles as applicable), PE, and Premises, have dedicated departmental policies. Copies of these departmental policies are available in the Teams Health & Safety folder.
- 5.2. Science and D&T departmental policies are built on the CLEAPSS templates, PE on the template given in their 'Safe Practice' handbook and Premises department policy is devised 'in-school'.
- 5.3. Embley follows the guidance outlined in United Learning's *Departmental Policies – Code of Practice*.

6. Emergency Planning

- 6.1. Embley has a business continuity plan in place which attempts to anticipate and mitigate the foreseeable risks of disruption that may affect the school. This covers a range of potential issues from the relatively minor to the potentially significant and health and safety considerations, both as a result of the causal event and any reactive measures, have been built into this planning process.
- 6.2. As part of this planning, Embley has arrangements in place for responding to immediate threats to the school and/or its staff or pupils – sometimes referred to as lockdown procedures. The school keeps itself updated on DfE's security guidance and any changes in local security profile as appropriate.

7. Group Memberships and Approved Management Standards

- 7.1. As part of United Learning, the school has membership to CLEAPSS and the Association for Physical Education (AfPE). These are United Learning's approved management standards for the practices carried out in science, D&T (incorporating food tech, art and textiles as applicable), and PE, and the school follows these standards.
- 7.2. National Guidance produced by the Outdoor Education Advisors Panel (OEAP) is United Learning's approved management standard for Educational Visits and the school plans, manages and carried out educational visits in line with this guidance.



8. Health and Safety Committee

- 8.1. Embley has a health and safety committee, the purpose of which is to oversee health and safety performance across all areas of school operation, including matters that occur ancillary to the main function of provision of education, e.g. lettings and events.
- 8.2. This committee meets once per term and membership includes, among others, the Headmaster, H&S Coordinator, Estates Manager, Heads of Department for higher risk areas (Science, D&T, and PE) and the LGB Representative for health and safety.
- 8.3. Embley follows the guidance outlined in United Learning's *Health and Safety Committee – Code of Practice*.

9. Insurance

- 9.1. As part of United Learning, Embley is covered by the group's policies for employer's liability compulsory insurance (ELCI), public liability, buildings, contents and vehicle insurance policy. Staff are insured for driving private vehicles for work purposes on an 'occasional use' basis.
- 9.2. Further details on the group's insurance arrangements are available via United Hub and the Company Secretarial team.

10. Lone Working and Violence at Work

- 10.1. In recognition of the risks presented from lone working and violence at work, these have been specifically considered by Embley in a dedicated risk assessment.
- 10.2. Where determined as necessary in the above risk assessment, staff have been provided with additional training to help deal with/deescalate conflict situations and staff are not expected to intervene in physical disputes unless specifically trained or contracted to do so.

11. Monitoring

- 11.1. Monitoring of health and safety performance is a foundation of an effective safety management system. It helps to highlight deficiencies before harm occurs and identify areas of potential improvement.
- 11.2. In support of this objective, Embley undertakes a range of proactive in-house monitoring activities which are planned and reviewed at the school's H&S Committee meetings. Embley also completes a number of United Learning led monitoring tasks each year, including a self-assessment process culminating in the Group H&S Annual Return.
- 11.3. United Learning centrally carries out a range of monitoring tasks including audits, investigations and data reviews to help monitor performance and identify areas for improvement.
- 11.4. Embley follows the guidance outlined in United Learning's *Monitoring (HS) – Code of Practice*.

12. New and Expectant Mothers

- 12.1. New and expectant mothers are vulnerable to risks to their health and safety that require specific consideration under health and safety law. The Education sector is relatively low-risk, but this does not mean that it is risk-free.



- 12.2. Any employee disclosing to their line manager that they are a new or expectant mother will receive a specific risk assessment that seeks to reduce their risk exposure, where possible.
- 12.3. Embley follows the guidance outlined in United Learning's *New and Expectant Mothers – Code of Practice*.

13. Occupational Health and Wellbeing

- 13.1. All United Learning employees have access to occupational health and wellbeing services through their local HR team. Further details on this provision are available from local HR Advisors and on United Hub.

14. Queries/Support Services

- 14.1. Where employees have queries regarding health and safety requirements or arrangements, the relevant United Learning Codes of Practice or approved management standard (CLEAPSS, AfPE, OEAP) should be reviewed in the first instance and if the answer cannot be found there, the query directed to the line manager.
- 14.2. If the line manager is not able to resolve the query, this should be escalated to the school's Health and Safety Coordinator, Claire Brighton.
- 14.3. Where it is not possible to resolve queries locally, these can be referred to the Head of Health and Safety for advice and support.

15. Risk Assessment and Risk Management

- 15.1. Risk assessment is central to effective risk management and forms a cornerstone of how Embley manages the safety and health of staff, students and others.
- 15.2. Risk assessments are carried out by those in control of any given activity, as they are the person(s) who understand the task best and how to carry it out safely.
- 15.3. Alongside 'whole school' risk assessments, the higher risk departments (science, D&T, PE, premises) review their activities against national body guidance (CLEAPSS, AfPE) to ensure activities are properly and adequately managed.
- 15.4. Risk assessments are reviewed at least every two years, or sooner if there is reason to believe they are no longer valid.
- 15.5. Embley follows the guidance outlined in United Learning's *Risk Management (HS) – Code of Practice*.

16. Safeguarding/Child Protection

- 16.1. Safeguarding and child protection arrangements at the school are the subject of a dedicated policy with support and monitoring provided by United Learning's Safeguarding team.
- 16.2. Further details are available from Embley's Designated Safeguarding Lead, Leah Goodey.

17. School Security

- 17.1. Embley considers school security as part of its wider risk management arrangements and includes the risks from such on its strategic risk register.



- 17.2. Reference is made to the [DfE guidance on school security](#) to ensure that a balanced and proportionate approach is taken to school security. A school security policy has been created and security arrangements are periodically tested to ensure they remain effective.

18. Supporting Pupils with Medical Needs

- 18.1. In line with DfE guidance, Embley, has a policy in place for supporting pupils with medical needs. This is overseen by Matron, Helen Gale.

19. Training/Competence

- 19.1. Having a competent workforce is essential to safe operation and effective curriculum delivery.
- 19.2. At Embley all staff undergo a comprehensive induction process to ensure they understand school policies and procedures.
- 19.3. Line managers identify and arrange additional training requirements that are necessary for the role and records of staff competencies are maintained.
- 19.4. School H&S leads have completed IOSH Managing Safely and this is refreshed every three years.
- 19.5. The minimum training requirements detailed in United Learning's *Training Code of Practice* are applied and maintained. A further non-exhaustive '[Good Practice Training Guide](#)' is available in the A-Z section of the H&S pages on United Hub.
- 19.6. Ongoing competence is reviewed at appraisal stage and staff are encouraged to identify training opportunities that may help to increase or reinforce their competences.
- 19.7. Records of induction and further training are held in the Teams Employee Induction Folder.
- 19.8. Embley follows the guidance outlined in United Learning's *Training – Code of Practice*.

20. Work-Related Stress

- 20.1. Work-related stress is a priority risk area in the education sector and has been formally assessed by Embley.
- 20.2. This assessment is kept under review and where necessary, action taken in line with the guidance outlined in United Learning's '*Work-Related Stress – Code of Practice*'.
- 20.3. Support for those suffering from stress is available from the school's HR Advisors and wider HR team, including occupational health where necessary.



Premises Arrangements

21. Asbestos

- 21.1. At Embley, asbestos is known or presumed to present in the school estate. The nominated asbestos management lead is the Bursar, Claire Brighton.
- 21.2. An asbestos survey by a UKAS accredited surveyor has been completed and the resulting action plan followed through. A detailed asbestos management plan has been devised detailing the day to day management of the risks from asbestos, and an asbestos register is maintained for all contactors who may disturb the building (including site staff) to review and sign-off as necessary.
- 21.3. Embley follows the guidance outlined in United Learning's Asbestos – Code of Practice

22. Confined Spaces

- 22.1. At Embley confined spaces have been identified, for which specific management controls have been devised to support safe access. These locations are:
 - Boiler room next to IT offices
 - Boiler room opposite the bursary
 - Boiler in Goldcrest bathroom
 - Storage room attached to the bursary
 - Loft space in PE1
 - Water tanks cupboard in Peregrine dormitory
 - Loft space in Woodlark dormitory
 - Cellar underneath manor house
 - Bathroom in Wellow dormitory
 - Metal shed inside a confined space attached to the bursary
- 22.2. These locations have been secured and clearly marked and access is permitted only in line with the above management controls.
- 22.3. Embley follows the guidance outlined in United Learning's Confined Spaces – Code of Practice.

23. Construction Projects

- 23.1. All construction projects, large or small, are managed with careful attention paid to the health and safety of those carrying out the work and on how their activities may impact upon others.
- 23.2. The precise approach taken varies depending on the complexity of the project, however, Embley will ensure compliance with the Construction (Design and Management) Regulations 2015, and Building Regulations requirements at all times. At Embley this process is overseen by Claire Brighton.



- 23.3. Larger capital projects are managed by United Learning's central Estates team and the school's appointed central estates manager is on hand to provide advice for all levels of construction and maintenance work as necessary.
- 23.4. Embley follows the guidance outlined in United Learning's *Construction Projects – Code of Practice*

24. Contractor Management

- 24.1. All contractors appointed by the school are subject to a proportionate screening and selection process. Competencies, insurance coverage, DBS checks (where applicable) and considerations of how health and safety is managed and how their activity may interact with the school's activity, are built into this process.
- 24.2. Records of these checks are held in the Estates Manager's Office and on the SCR (for DBS).
- 24.3. Embley follows the guidance outlined in United Learning's *Contractor Management – Code of Practice*

25. Defect Reporting

- 25.1. Embley has a formal, auditable process in place for the logging of defects or issues with the premises.
- 25.2. Embley uses the FreshWorks electronic ticketing system for logging defects and issues.

26. Electrical

- 26.1. In accordance with BS7671 ('the wiring regulations'), the electrical systems in the school are maintained in a safe condition and formally inspected at least every five years by a competent electrician.
- 26.2. Work on electrical systems is only carried out by those competent to carry out such work and provide certification where required.
- 26.3. In accordance with BS7671 ('the wiring regulations'), the pool hall and associated plant room(s) are subject to annual inspection.
- 26.4. Electrical inspections normally generate an action plan and Embley takes steps to implement any required actions in line with the timelines defined in the inspection.
- 26.5. Copies of test certificates and action plans for Embley are held in the Estate Manager's office and copies have been uploaded to United Learning's Premises Compliance Database (PreCoD).
- 26.6. Emergency procedures are in place for the isolation of mains power if required. These can be found in the Estates Teams folder.
- 26.7. Portable electrical appliances are inspected and maintained in accordance with the frequencies specified in HSE publication INDG236.
- 26.8. Embley is a boarding school and as such boarders have access to portable appliance testing which is coordinated by Harry Boxell. Expectations on what equipment is and is not suitable



for boarders to bring into schools is communicated to students when joining the school and any unauthorised equipment will be removed during routine inspection of boarding facilities.

26.9. Embley follows the guidance outlined in United Learning's *Electrical Safety – Code of Practice*.

27. Fire

27.1. The protection of risk from fire, both to persons and to property, is a priority for the school. To help manage this risk, Embley has a fire risk assessment carried out at least every five years by a organisation meeting the competency criteria laid down in the Fire Sector Federation's 'Guide to Choosing a Competent Fire Risk Assessor'.

27.2. All fire risk assessments generate an action plan and Embley takes steps to implement any required actions in line with the timelines defined in the assessment.

27.3. A Fire Safety Management Plan has been devised for Embley. This document summarises the school's arrangements for the protection of risk from fire, the maintenance and inspection of protection and alarm systems and the training provided to staff, including fire wardens.

27.4. Copies of fire risk assessments, action plans and fire safety management plans for Embley are held on the Teams H&S Folder and copies have been uploaded to United Learning's Premises Compliance Database (PreCoD). The school's nominated fire safety lead is Claire Brighton.

27.5. Embley follows the guidance outlined in United Learning's *Fire Safety – Code of Practice*.

28. Gas

28.1. Gas installations and equipment at Embley are maintained in a safe condition subject to formal inspection by competent persons (GasSafe Registered).

28.2. Copies of inspection and maintenance records and any associated action plans for Embley are held in the Estates Manager's office and copies have been uploaded to United Learning's Premises Compliance Database (PreCoD).

28.3. Emergency procedures are in place for the isolation of gas if required. These can be found in the Estates Teams folder.

28.4. Embley follows the guidance outlined in United Learning's *Gas Safety – Code of Practice*

29. Glazing

29.1. A glazing assessment has been carried out to identify any potentially vulnerable areas and to ensure that any glazing to which persons may potentially come into contact with are of a suitable safety standard.

29.2. A copy of this assessment is held in the Teams H&S Folder.

30. Planned Preventative Maintenance (PPM)

30.1. To prevent degradation to the point where failure may occur or harm may be realised, and in support of any warranties that may be present, all plant, equipment and facilities are maintained in accordance with manufacturer, supplier, or installer inspection and maintenance regimes.



- 30.2. At Embley, this process of PPM management is overseen by Harry Boxell with records of PPM activities held in the Teams Health & Safety folder.

31. Premises Compliance Database (PreCoD)

- 31.1. United Learning operates a Premises Compliance Database (PreCoD), hosted on the Education Information Portal (EIP).
- 31.2. This database supports tracking and key task reminder functions for the school on the key premises risk areas of asbestos, fire, electrics, gas, water, and radon.
- 31.3. This data is monitored by United Learning's Health & Safety and Estates departments.
- 31.4. At Embley the nominated lead for the upload and management of data on PreCoD is Claire Brighton.

32. Radon

- 32.1. Embley has reviewed its risk from radon and it is not in a radon affected area, nor are there any below ground areas that are occupied for >50 hours per year.
- 32.2. Radon monitoring is carried out periodically and the results acted upon where necessary. Details of the schools radon monitoring and risk assessments are held in the Teams H&S Folder and are uploaded to United Learning's Premises Compliance Database (PreCoD). The school's nominated lead for radon management is Claire Brighton.
- 32.3. Embley follows the guidance outlined in United Learning's *Radon – Code of Practice*.

33. Traffic Management

- 33.1. In recognition of the risk of pedestrians and vehicles coming together on the school site, a traffic management plan has been devised. All pedestrians should follow demarcated walkways and directional signage as necessary.
- 33.2. While the highway is outside of the school's operational control, parents and other site visitors with vehicles are encouraged to exercise caution and respect when driving near the school.
- 33.3. Embley follows the guidance outlined in United Learning's *Traffic Management – Code of Practice*.

34. Trees and Wooded Areas

- 34.1. Trees and wooded areas have been risk assessed to ensure they do not pose unacceptable risks to health and safety.
- 34.2. For larger trees and where due to potential falling or sloughing branches a foreseeable risk of harm exists, a tree survey has been carried out by arboriculturist consultant and the advice provided by them regarding treatment and management is followed to ensure this risk is managed.
- 34.3. Copies of such surveys and risk assessments are held in the Grounds Yard Office.



35. Water Hygiene

- 35.1. Water systems are actively managed to reduce the legionella risk as far as is reasonably practicable. To support this, Embley has a legionella risk assessment carried out at least every five years by a competent contractor holding membership to the Legionella Control Association (LCA).
- 35.2. Legionella risk assessments generate an action plan and Embley takes steps to implement any required actions in line with the timelines defined in the assessment.
- 35.3. A written scheme of control has been devised which details the day-to-day management strategy for water hygiene. This involve a combination of tasks carried out in-house and by a third party appointed water hygiene contractor. Processes are in place for handling issues should they arise.
- 35.4. Copies of legionella risk assessments, action plans and written schemes of control for Embley are held in the Teams H&S Folder and copies have been uploaded to United Learning's Premises Compliance Database (PreCoD). The school's nominated water hygiene lead is Claire Brighton.
- 35.5. All outlets that dispense wholesome/potable water are clearly marked as such.
- 35.6. Emergency procedures are in place for the isolation of water if required. These can be found in the Estates Team folder.
- 35.7. Embley follows the guidance outlined in United Learning's *Water Hygiene – Code of Practice*.

36. Workplace Welfare

- 36.1. All areas of the school site are managed in accordance with the requirements of the Workplace (Health, Safety and Welfare) Regulations 1992, and Building Regulations requirements in respect of matters such as temperature, ventilation, rest areas, changing facilities etc.
- 36.2. Embley follows the guidance outlined in United Learning's *Workplace Welfare– Code of Practice*.



Operations Arrangements

37. Catering

- 37.1. Catering at Embley is provided by Lexington Independents. The school works closely with the provider to ensure food standards are maintained.
- 37.2. Catering at Embley is delivered in-house and the catering manager is Chantelle Phillips. Catering operations are carried out in strict adherence to food hygiene legislation and the catering department has a formally documented food safety management system

38. Combined Cadet Force (CCF)

- 38.1. Embley operates a Combined Cadet Force. This is led by and carried out in accordance with MOD policies and procedure.

39. Display Screen Equipment

- 39.1. For those employees identified as display screen equipment (DSE) users (those who use DSE for continuous periods of an hour or more), training on safe use to prevent musculoskeletal disorders has been provided and their workstations have been assessed.
- 39.2. These assessments are reviewed at least every two years or sooner if there is reason to believe they are no longer valid.
- 39.3. Records of these DSE assessments are held in the Bursary.
- 39.4. Embley follows the guidance outlined in United Learning's *Display Screen Equipment – Code of Practice*

40. Driving for Work

- 40.1. Those who regularly drive on work business or who transport pupils have their licences checked annually to ensure they remaining suitable to drive. Staff are required to bring to the attention of their line manager any endorsements or restrictions placed on their licences that may affect their ability to perform these duties.
- 40.2. Embley operates 27 minibuses. These are operated under a section 19 permit and are used and maintained in accordance with DfE and ROSPA guidance for school minibuses.
- 40.3. Those who drive minibuses on school business have been provided with MiDAS training to ensure their competence can be demonstrated.
- 40.4. Embley follows the guidance outlined in United Learning's *Driving for Work – Code of Practice*.

41. Educational Visits

- 41.1. United Learning fully endorses the National Guidance produced by the Outdoor Education Advisors Panel (OEAP). Embley follows the principles outlined in this guidance.
- 41.2. The school's EVC, Rebecca Clayton, has completed OEAP Training and this refreshed every five years. Visit leaders have been provided with the necessary training to ensure they are competent for their role. Further details on Embley educational visits can be found in the local



visit policy which is built on the OEAP National Guidance format and held on the school website.

- 41.3. The school operated Duke of Edinburgh awards which are led by Zack Coleman and operated in accordance with DofE principles.
- 41.4. Embley follows the guidance outlined in United Learning's *Educational Visits – Code of Practice*.

42. Event Management

- 42.1. Special events, concerts, plays, fairs and other school led events are an important part of Embley's culture.
- 42.2. To ensure they are properly planned and managed Event Safety Management Plans are drawn up for all events.
- 42.3. Embley follows the guidance outlined in United Learning's *Event Management – Code of Practice*

43. First Aid

- 43.1. A first aid needs assessment has been developed to ensure that Embley is able to respond to first aid incidents in an appropriate manner at any time that the site is operational or staff are present, including outside of normal school hours where activities carry on beyond this.
- 43.2. In line with the EYFS Framework, a sufficient number of paediatric first aid (PFA) trained staff have been appointed in early years settings to ensure provision is available at all times that children are on the premises and during outings.
- 43.3. First aid incidents are recorded in line with the arrangements for Accidents, outlined above.
- 43.4. Embley follows the guidance outlined in United Learning's *First Aid – Code of Practice*

44. Hazardous Substances

- 44.1. All hazardous substances in Embley are managed in accordance with the Control of Substances Hazardous to Health Regulations 2005 (COSHH). Namely, their risks are assessed and suitable safe working practices devised to support safe use.
- 44.2. Science and Design and Technology departments make reference to guidance from CLEAPSS in respect to the safe use of hazardous substances in their departments.
- 44.3. Any equipment designed to support the safe use of hazardous substances is maintained in accordance with statutory requirements, e.g. local exhaust ventilation units are inspected at least every 14 months. Copies of any such inspection records are held Departmental H&S folders and/or the Teams H&S folder.
- 44.4. Embley follows the guidance outlined in United Learning's *Hazardous Substances – Code of Practice*.



45. Infection Control and Health Protection

- 45.1. While not a matter covered by health and safety law, Embley recognises the position it holds in the local community and the role it can play in supporting the management and control of community acquired infections.
- 45.2. In this regard, the school follows UKHSA's guidance on '[Health protection in children and young people settings, including education](#)', which includes guidance on infection control, immunisation programmes and other health protection measures.
- 45.3. For infectious diseases of significance, the school will work with its local health protection unit on the development and implementation of any control measures required to protect employees, pupils and the wider school community.

46. Manual Handling

- 46.1. Embley recognises the risk of musculoskeletal disorders that can be caused by poorly managed manual handling activities. To manage this risk, all manual handling activities have been considered and those presenting a foreseeable risk of injury have been specifically assessed.
- 46.2. Staff are trained accordingly in safe manual handling practices.
- 46.3. Embley follows the guidance outlined in United Learning's *Manual Handling – Code of Practice*.

47. Noise at Work

- 47.1. To manage the risks from exposure to noise at harmful levels, Embley has reviewed all operations and carried out formal noise exposure risk assessments where applicable.
- 47.2. Embley follows the guidance outlined in United Learning's *Noise at Work – Code of Practice*.

48. Personal Protective Equipment (PPE)

- 48.1. Personal Protective Equipment is deployed wherever the activity risk assessment has identified this as a required control measure for reducing the risk of harm. Where PPE has been used, it has been carefully selected to ensure it provides suitable protection for the hazard concerned.
- 48.2. Embley follows the guidance outlined in United Learning's *Personal Protective Equipment – Code of Practice*.

49. Pressure Systems

- 49.1. At Embley pressure systems are managed in accordance with statutory requirements and subject to inspection and maintenance accordingly. Records of inspection and maintenance are available in the Teams H&S Folder.
- 49.2. Embley follows the guidance outlined in United Learning's *Pressure Systems – Code of Practice*.



50. Public Use/Lettings

- 50.1. Embley is available for use/lettings by members of the public, either by direct contract e.g. letting, or by more open agreement, e.g. where school sport facilities are available for open access by the general public.
- 50.2. All lettings are formalised by a lettings agreement which includes appropriate details on the division of responsibilities regarding safety arrangements during the period of hire. In the majority of cases, this will need only be the provision of information on emergency arrangements e.g. fire alarm, though there may be situations where more detailed consideration is required and Embley evaluates such requirements when drawing up lettings agreements.
- 50.3. Where members of the public have open access to facilities, the responsibility is on the school to ensure safe access, appropriate maintenance, and the availability of suitable emergency response measures. Much of these arrangements may involve nothing more than a continuation of existing school risk assessment and arrangements, nevertheless the nominated Lettings Manager, will ensure all risk assessments are specific to the hazards presented during such use.

51. Radiation at Work

- 51.1. At Embley the risks from artificial optical radiation have been risk assessed and controlled/discounted as not applicable.
- 51.2. The school possesses ionising radiation sources in the science department. These are managed in accordance with CLEAPSS publication L93 and the department is subject to periodic audit, at least every two years, by United Learning's retained Radiation Protection Officer.
- 51.3. Embley follows the guidance outlined in United Learning's *Radiation at Work – Code of Practice*.

52. Swimming

- 52.1. Embley has a swimming pool for which, in line with HSE guidance, Pool Safety Operating Procedures (PSOP) containing a Normal Operating Plan (NOP) and Emergency Action Plan (EAP) have been devised.
- 52.2. At all times that the pool is in use by the school, a suitably qualified adult will be available poolside to effect rescue if necessary.
- 52.3. Embley follows the guidance outlined in United Learning's *Swimming – Code of Practice*

53. Work and Play Equipment

- 53.1. The selection and appropriate maintenance of work and play equipment is essential to the protection of health and safety.
- 53.2. To this end, work equipment is matched to the task and maintained in accordance with statutory requirements where applicable, e.g. lift inspections, or operation and maintenance



manuals as necessary, with records of inspection maintained in an accessible location. All work equipment is subject to user checks prior to use.

- 53.3. Play equipment is matched to the age and ability of the group to which it is being deployed and risk assessed accordingly.
- 53.4. Load bearing equipment such as trim trails are inspected annually by a third party RPII accredited inspector.
- 53.5. Ebley follows the guidance outlined in United Learning's *Work and Play Equipment– Code of Practice*.

54. Work at Height

- 54.1. Falls from height often have serious consequences and therefore work at height needs to be robustly controlled.
- 54.2. Work at height is only carried out where absolutely necessary and only following risk assessment, using suitable equipment and by suitably trained staff.
- 54.3. For general office/classroom use, small stepstools/step ladders have been provided. Staff must not use desks or chairs to carry out work at height of any duration.
- 54.4. All work at height equipment is inventoried and subject to formal inspection with records of inspection held in the Teams H&S folder.
- 54.5. Roof access is strictly controlled and the subject of specific risk assessment.
- 54.6. Ebley follows the guidance outlined in United Learning's *Work at Height – Code of Practice*.

55. Work Experience, Young Persons and Apprenticeships

- 55.1. Work experience and apprenticeships are carefully managed to ensure those joining the school or going out on placement will be working in an appropriate department and not exposed to unreasonable levels of risk. The school will work with providers on agreeing standards as necessary.
- 55.2. Should the school take on a person below the age of 18 (be it as an employee, work experience or apprentice) a young persons risk assessment will be carried out before they commence work.
- 55.3. Ebley follows the guidance outlined in United Learning's *Work Experience, Young Persons and Apprenticeships – Code of Practice*.



Local Organisation of Health and Safety

Shown below are the key personnel involved in health and safety management at Embley

Topic Area	Delegated Lead (Name and Position)
Health and Safety Coordinator	Claire Brighton
LGB Representative for Health and Safety	Rachel Brooks
First Aid Lead	Helen Gale
Premises Lead	Claire Brighton
Security Lead	Claire Brighton
Designated Safeguarding Lead	Leah Goodey
Educational Visits Coordinator	Rebecca Clayton
Radiation Protection Supervisor	Kathren Lea
Trade Unions Appointed Safety Representatives	N/A
Representatives of Employees	N/A

Cluster Roles	Lead
Executive Business Manager	N/A
Cluster Health and Safety Lead	N/A

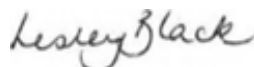
Embley herby adopts this policy and undertakes to follow the arrangements detailed within and United Learning codes of practice as referred to. A copy of this policy will be shared with all employees and made available on the school website.

Headmaster Cliff Canning



02.12.2025

Chair of the LGB Lesley Black



02.12.2025

