

Pensby Primary School

Every child belongs, achieves and believes in themselves.



FRAMEWORK HEALTH AND SAFETY

POLICY & GUIDANCE

Agreed by: FGB
Date: September 2025
Review Date: September 2026

School's Framework Health and Safety Policy and Guidance
HS/ECS/002 September 2019

Date	Amendments	Officer
27/08/19	Revised 3.26 Violence and Aggression	Jeanne Fairbrother
19/11/2020	Reformatted and Updated	Tony Dean
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22/03/2023	Updated 1.2 to include Sec 29(5) Education Act 2002	Tony Dean
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Health & Safety Management system - introduction

Your school's health & safety policy is the start of your Health & Safety Management System (HSMS). The purpose of a HSMS is to ensure that all relevant health and safety requirements are identified and that there is a structure in place for carrying them out to the correct standard and the required frequencies.

The HSMS promotes a cyclical approach to health and safety management that operates over an annual basis and is then repeated, with the aim of continually improving health and safety in the school. This is in line with the Health & Safety Executive's *Managing for Safety HSG65*.

Health and safety management requirements and statutory inspection and maintenance requirements that need to be met by schools are presented in the various sections of the HSMS.

The diagram below shows a pictorial representation of the Health and Safety Management System or *management cycle*.

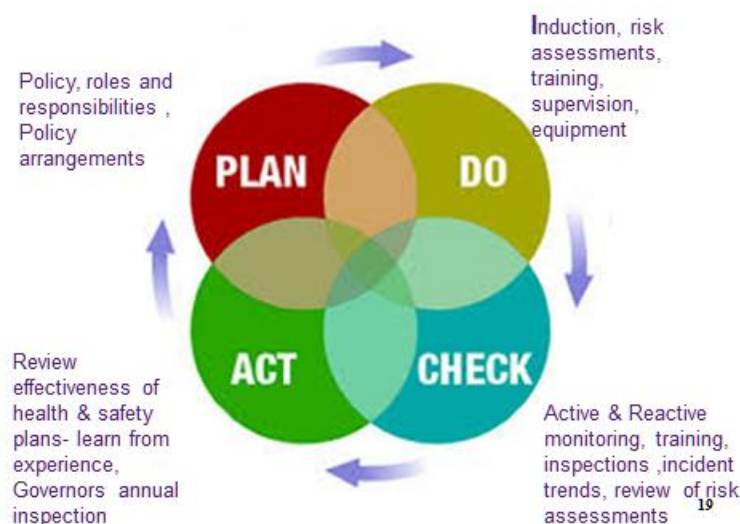


Figure 1: Health and Safety Management System (HSMS)

- In the **policy** (Plan) stage schools are stating what it is they are going to do with regards to health and safety and ensuring that they have a management structure in place to achieve this (roles and responsibilities). They are making a commitment.
- In the **planning and implementation** (Do) phase, schools are **doing** what they stated they would do.
- In the **monitoring** (Check) phase, schools are **checking** to ensure they are doing what they said they would do.

- In the **evaluating and reviewing** (Act) phase, schools are looking at their overall health and safety performance over the year (successes and failures) and then **acting** upon the findings to ensure their policy, arrangements and organisation are modified in order to build on successes and iron out failures.

PENSBY PRIMARY SCHOOLS' FRAMEWORK HEALTH AND SAFETY POLICY



1. Introduction

1.1. Health and Safety at Work etc Act 1974

This Act places a duty on all employers to safeguard so far as is reasonably practicable the health, safety and welfare of all their employees. In addition to this, duties extend to cover the health and safety of persons not employed but who may be affected by the work activities undertaken such as pupils, visitors, contractors, etc.

The Authority retains the above responsibilities under local management of schools as an employer in the same way the Governing Body of Academies, Aided and Trust schools. This also includes Sec 29(5) Education Act 2002, where the schools must comply with any direction given to them by the LA concerning the health and safety of persons on the school's premises or taking part in any school activities elsewhere. Equally, it is important that all employees understand that they have legal duties under the Health and Safety at Work Act, to co-operate with their employer so far as is reasonably practicable to ensure a safe and healthy place of work.

This General Statement of Safety is not intended to replace the Wirral Local Authority's Corporate Health and Safety Policy but to detail individual schools' Arrangements and Organisation for Health and Safety.

1.2. General statement of intent

The Governing Body of Pensby Primary School will strive to achieve the highest standards of health, safety and welfare consistent with their responsibilities under the Health and Safety at Work etc Act 1974 and other statutory and common law duties to provide a safe and healthy work place and working environment for all its employees, pupils, visitors and other persons who may be affected by its activities.

The Head teacher and Governing Body will ensure that the Local Authority's Health and Safety policy is implemented, all Management Arrangements identified in the policy and further guidance are followed and monitored throughout the school.

This policy will be brought to the attention of, and/or issued to all members of staff on induction and annual refresher at the start of each school year.

It is essential for the success of this Safety Policy that all employees recognise their responsibilities under Sections 7 and 8 of the Act in co-operating with management on health and safety issues and taking care of themselves and other persons whilst at work.

The Health and Safety Policy will be reviewed on an annual basis and the Management Arrangements will be implemented .

Signed: ...David Spencer(Chair of Governors) Date: September 2025

Signed:Kirsty WrightHead teacher) Date: September 2025

2. ORGANISATION

As the employer, the Local Authority has overall responsibility for health and safety in Community Schools, Community Special Schools, Voluntary Controlled Schools, Maintained Nursery Schools and Pupil Referral Units.

In Foundation/Trust Schools, Foundation/Trust Special Schools, Voluntary Aided Schools, Academies and Independent Schools, the responsibility for health and safety rests with their employer, The Governing Body.

To achieve successful implementation of the safety policy there should be clear lines of communication throughout the organisation.

Whilst the ultimate responsibility for health and safety remains with the employer a wide range of functions may successfully be delegated to the Head teacher, but the duty to comply with statutory requirements cannot be delegated away from the employer.

2.2. Responsibilities of the Governing Body

- a) Formulating a Health and Safety statement detailing the responsibilities for ensuring health and safety within the establishment;
- b) Regularly reviewing health and safety arrangements and implementing new arrangements where necessary;
- c) Providing appropriate resources within the establishment's budget for the implementation of the attached arrangements;
- d) Receiving from the Head Teacher or other nominated member of staff reports on health and safety matters and reporting to the Local Authority or other body as necessary. This will include receiving the school's Inspection Checklist or similar which reviews the establishment's health and safety annual performance.
- e) Promoting a positive health and safety culture and high standards of health and safety within the establishment.

2.3. Responsibilities of the Head Teacher

In line with the Schools Health & Safety Management System, the Head Teacher has responsibilities for:

PLAN

- Overall responsibility for the day-to-day management of health and safety in the school;
- Complying with any direction given by the LEA concerning the health and safety of persons on the school's premises or taking part in any school activities;
- Ensuring that they have access to competent advice on health and safety e.g. Wirral Council's Health & Safety SLA;

DO

- Creating and encouraging a positive and pro-active Health and Safety culture across the school;
- Implementing the establishments health and safety Management Arrangements which form part of this policy;
- In implementing the Management Arrangements, delegating specific tasks to other members of staff;
Note: the delegation of certain duties will not relieve the Head teacher from the overall day to day responsibilities for health and safety within the establishment;
- Ensuring that the school has a defined system in place for undertaking suitable and sufficient risk assessments;
- Ensuring appropriate systems are in place to ensure that the premises, plant and equipment are maintained in a serviceable and compliant condition;
- Ensuring all staff are provided with suitable and sufficient information, instruction and training on health and safety issues;
- Ensuring that Health and Safety investigations are carried out by competent person/s;
- Communicating the policy to all relevant parties, including support, temporary and supply staff, contractors, volunteers and third-party users;
- Ensuring that consultation arrangements are in place for staff and their trade union representatives (where appointed) and recognizing the rights of trade unions in the workplace;
- Ensuring that the establishment has emergency procedures in place and has a Business Continuity Plan for emergency and crisis situations;
- Ensuring the staff have been served with the policy (see appendix 'A')

CHECK

- Actively monitoring the implementation of the Management Arrangements;
- As part of the emergency arrangements, scheduling tabletop exercises to simulate emergency situations to assess the effectiveness of the emergency plan and amend as required;
- Ensuring that the annual school's Inspection Checklist (see Forms) is completed and together with the resulting action plan;
- Ensuring that Health and Safety Audits are carried out by a competent person as required (see 3.6)

Note: for schools who do not buy back the LA's SLA service, the audit and associated action plan must be sent to the LA Health & Safety team (healthsafetyandresilience@wirral.gov.uk) within 28 days of receipt

ACT

- Ensuring that any actions arising from the annual school's Inspection Checklist and Health and Safety Audits are implemented as required;
- Notifying the Local Authority (healthsafetyandresilience@wirral.gov.uk) when actions arising from the Health and Safety Audits have been implemented;

- Advising Governors of the areas of health and safety concern which may need to be addressed by the allocation of appropriate resources, e.g. time, effort, finance;
- Reporting to the Local Authority (where they are the employer) any hazards which cannot be rectified within the establishment's budget;
- Providing updates to Governors on the monitoring of the implementation of the Management Arrangements including implementing actions from audits.

2.3. Responsibilities of Employees

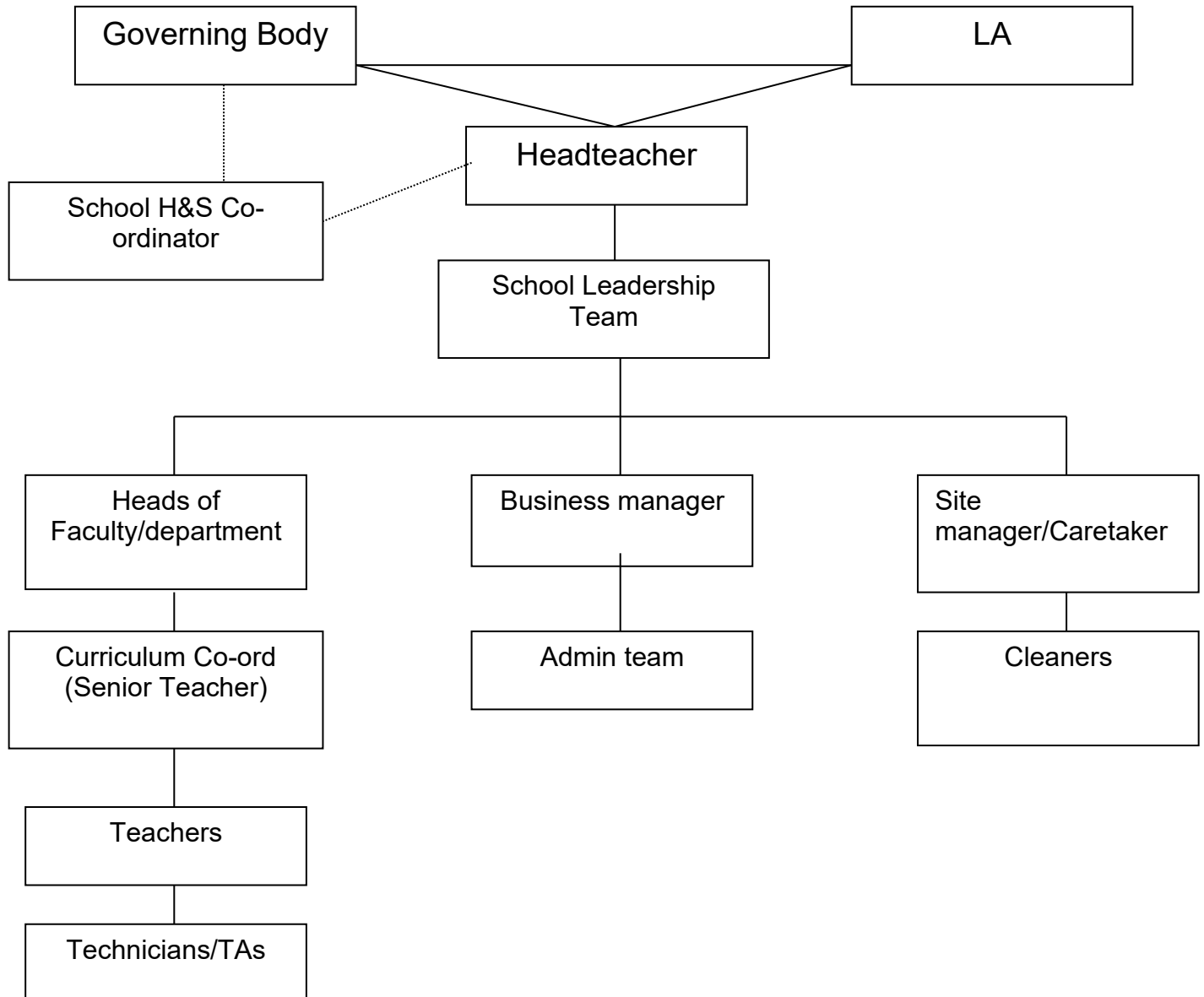
Under the Health & Safety at Work etc. Act 1974 all employees have general health and safety responsibilities. Staff must be aware that they are obliged to take care of their own health and safety whilst at work along with that of others who may be affected by their actions. All employees of the establishment have the responsibility to:

- Take reasonable care for the health and safety of themselves and others in undertaking their work.
- Comply with the school's health and safety policy and procedures at all times
- Report all accidents and incidents in line with the Local Authority's reporting procedures;
- Cooperate with school management on all matters relating to health and safety;
- Not to intentionally interfere with or misuse any equipment or fittings provided in the interests of health, safety and welfare;
- Report all defects in the condition of premises or equipment and any health and safety concerns immediately to their Line Manager;
- Report immediately to their Line Manager any shortcomings in the arrangements for health and safety;
- Ensure that they only use equipment or machinery that they are trained, competent and authorised to use.
- Make use of all necessary control measures and personal protective equipment provided for safety or health reasons.

2.4. Management Chain- health and safety responsibilities organigram chart

Guidance:

Schools health and safety responsibilities organisation chart (example below can be adapted)



2.5. Consultation Procedures

The following forums are in place at which Health and Safety issues can be raised by any employee associated with the school;

2.5.1 Local Authority

APT&C JCC

Agenda items to be sent to Susan Blevins Senior HR Manager Schools
susanblevins@wirral.gov.uk

2.5.2. School [delete as required]

- i. School Health and Safety Committee
- ii. Governors committee/sub-committee
- iii. Staff meetings (standing agenda item)
- iv. PTA (standing agenda item)
- v. Pupil Voice (as required)
- vi. Departmental meetings (standing agenda item)

MANAGEMENT ARRANGEMENTS

3. GENERAL RESPONSIBILITIES

3.1. Risk Assessments

The Head teacher on behalf of the Governing Body will assess the risks to the health and safety of their employees while they are at work in accordance with Regulation 3 of the Management of Health and Safety at Work Regulations 1999.

All risks around the building, grounds, rooms, workplace tasks, occupations, events and equipment involving will be assessed and approved by the Head teacher. These risk assessments are available for all staff to view and are held centrally in the staff shared drive.

Specific risk assessments relating to individual persons, e.g. employee with medical condition or young person/pupil are held on that person's file.

3.2. Curriculum Activities

Safety policies and Risk Assessments for Curriculum activities will be carried out by relevant Heads of Department and subject teachers using relevant Health and Safety Codes of Practice for Design & Technology, Science, Art and PE etc. Lesson risk assessments should be incorporated in either Schemes of Work or Lesson Plans and safety within lessons should be included in lesson observations.

Heads of department are responsible for ensuring maintenance requirements for equipment in their areas are identified and implemented.

The Headteacher and SBM will identify all work equipment in an equipment register and ensure that risk assessments are carried out, identifying any relevant servicing / routine maintenance / inspection regimes, training or instruction needs, personal protective equipment requirements and authorised users.

The following equipment has been identified as likely to involve a specific health and safety risk and details are given below on inspection, statutory inspections maintenance and testing.

3.3. Non-curriculum Activities

Risk assessments for non-curriculum activities will be carried out by competent persons in accordance with local authority guidance.

Risk assessments will be reviewed on an annual basis, when there has been a change in location, equipment, people and procedures and always after a reported

accident and/or near miss. Staff carrying out activities should be made aware of risk assessments and any changes to risk assessments relating to their work.

3.4. Educational Visits

Well planned and executed educational visits provide our pupils with valuable experiences which enhance their learning at school. Providing a variety of 'real-life' opportunities for our children enables them to achieve a fuller understanding of the world around them through direct experience. Educational visits are an essential element of good practice.

Purposes

Educational Visits can provide stimulus and support to work being covered as part of the school curriculum. It may be that a visit provides an effective stimulus at the start of a unit of work; alternatively teachers may decide to use an educational visit at any time during a project to enhance and support the curriculum.

Wherever or whatever the venue, teachers should ensure that the educational benefits to the children are maximised.

Guidelines

The organisation of an educational visit is crucial to its success. With rigorous organisation and control, a visit should provide a rich, learning experience for the pupils. EVOVLE is in use in Wirral Schools and in accordance with the Local Authority's Guidance for the Management of Learning Outside the Classroom (LOtC) and Offsite Visits, it is a requirement that all school's use the EVOLVE system.

The Educational Visits Coordinator (Headteacher and Linda Grant (DHT)) will be required to implement the guidance as appropriate when the school undertakes offsite visits.

Outdoor Education Advisers' Panel <http://www.oeap.info/>

3.5. Inspections

Proactive monitoring involves actively looking for hazards and identifying risks on a regular basis in order to rectify them before they can cause harm. Head teacher on behalf of the Governing Body will ensure that a schedule of proactive monitoring is in place, which includes the following as a minimum standard:

- A general workplace inspection of the site will be conducted termly and be undertaken / co-coordinated by a group of stakeholders e.g. governors, head teacher, health & safety coordinator, staff representatives, site manager, business manager etc.
- The person(s) undertaking the inspection will complete a report and action plan in writing and submit this to the head teacher/centre manager

- Responsibility for following up items detailed in the safety inspection report will rest with the SBM
- Monitoring inspections of individual departments will be carried out by Heads of Department or nominated staff. Advice and pro forma inspection checklists can be found in CLEAPSS (for sciences and DT)
- An annual inspection, using the School's Inspection Checklist or similar, by SMB and H&S Chair of governors will be undertaken and an action plan created, this will be reported back to the full governing body meetings.
Note: a copy will be sent to the H&S Team (healthsafetyandresilience@wirral.gov.uk), who will review the action plan and this will form the basis of the next audit of the school.

3.6. Audits

- In order to monitor compliance in relation to health and safety legal duties, all community maintained and voluntary controlled educational establishments must provide evidence of an audit carried out by a competent person as follows,
 - Special Schools – annual
 - Secondary – every 2 years
 - Nursery / Primary – every 3 years
- The LA Health and Safety team will carry out a programme of audits for all educational establishments who 'buy back' the SLA service
- For community maintained and voluntary controlled educational establishments who do not 'buy back' the Schools SLA service, they must ensure that audits are carried out by an independent and competent person, as required above

3.7. Training

The Head teacher on behalf of the Governing Body will ensure:

- through the risk assessment process, identify essential safety training needs and ensure that it is delivered as required including refreshers
- suitable health and safety awareness training is provided to those in management or leadership roles.
- training records are available for all employees
- there is a formal induction for permanent /temporary/supply /volunteer employees to bring their attention to their health and safety responsibilities and the arrangements in place for health and safety. This includes risk assessments for the activities they will carry out in school.

3.8. Accident Reporting

Management Guidance - Definitions

- An *accident* is an unplanned, unwanted event however minor that causes injury to people, damage to property or other loss.
- A *near miss* is a similar unplanned event without consequent injury or loss, but which had the potential to do so. Reporting these incidents help identify any

weaknesses in operational procedures as deviations from normal good practice may only happen infrequently but could have potentially high consequences

- A *dangerous occurrence* is something that happens in connection with the work of the school and is included in the relevant schedule of the RIDDOR Regulations.
- A *lost time accident* is an accident which is not RIDDOR reportable but involves lost time from work or possibly required first aid treatment.
- The RIDDOR Regulations are the Reporting of Injuries, Diseases and Dangerous Occurrence Regulations 1995
- Industrial Injury and industrial illness have specific meanings that relate to state benefit payments. For the purpose of these arrangements industrial injury is any work-related injury or illness. A work-related injury is caused or exacerbated by the particular work tasks, demands or environment that obtains at work.

In accordance with the Reporting of Injuries, Diseases & Dangerous Occurrences Regulations 2013 and Local Authority guidance the governing body and Head teacher on behalf of the Governing Body will report :

- Accidents, dangerous occurrences, and near misses on the standard Local Authority Incident and Dangerous Occurrence Report (M13) form.
- Incidents of physical violence and verbal abuse on the standard Local Authority Incident Report (MV92) Form.

Copies of these forms are available from the School Office

The Head teacher/Centre Manager will countersign the report form before the original copy is sent to the CYPD's Health & Safety Section for a decision if the incident is to be reported to the HSE as required by RIDDOR. A copy should also be retained at the establishment.

Medical Tracker is used to record all minor incidents to children and young people and school staff, including individual accident reports. More significant incidents and those involving visitors, contractors and members of the public must be reported to CYPD's Health & Safety Section using the forms described above.

Accident statistics will be monitored for trends and a report made to the Governors/Senior Management Team, as necessary.

The Head teacher/Centre Manager or their competent nominee will investigate accidents and take remedial steps to avoid similar instances recurring. Faulty equipment, systems of work, plant, equipment, fittings etc. must be reported and attended to as soon as possible.

4. BUILDINGS

4.1. Asbestos

Pensby Primary and Stanley Primary are new buildings and contain no asbestos.

4.2. Legionella

In accordance with the requirements of the HSE's Approved code of Practice for the control of Legionella L8, the Head teacher on behalf of the Governing Body will be the 'responsible person' and will ensure:

- That the use of systems that give rise to a foreseeable risk of legionellosis is avoided or, where this is not reasonably practicable, written schemes for minimising the risk from exposure are prepared, implemented and monitored
- A current legionella risk assessment is in place and a management control programme implemented. [Nominated competent persons are appointed by the Local Authority to undertake Risk Assessments throughout].
- The risk assessment is reviewed every 2 years or when there is significant change to the system or use of the building.
- Ensure appropriate statutory and evidential records are maintained for each premises including:
 - findings of the risk assessment
 - implementation details of the written scheme
 - the results of any monitoring, inspection or test including dates and conducted by whom
- Statutory monitoring will be covered by regular checks undertaken by the nominated competent person and will address any issues that are highlighted by the Risk Assessment.
- Additional checks will be required particularly where there are showers and after periods of non-use e.g. summer holidays and these requirements will be addressed by HSL (SLA) These should be recorded.
- Thermostatic temperature control valves are maintained on an annual basis to ensure correct operation.

Asset Management undertake the management of the contract with Hertel (for schools purchasing the Asset Management SLA) and any queries should be directed to Technical Services, 606 2388.

4.3. Fire

Under the Regulatory Reform (Fire Safety) Order 2005, the Head teacher on behalf of the Governing Body is the 'responsible person' and is responsible for ensuring:

- A current fire risk assessment is located in the log book.
- The fire risk assessment is reviewed on an annual basis or when there are changes to the building.

- Remedial actions identified in the Fire Risk Assessment have been completed and signed off.
- The headteacher is the Responsible Person for Fire Safety and for ensuring the fire risk assessment is undertaken and implemented.
- Written fire/emergency procedures are made available to all staff and included in the establishment's induction process.
- An outline of evacuation procedures are made available to all contractors / visitors and are posted throughout the site.
- Fire plans have been drawn up to assist the fire and rescue service on arrival. These are retained in the fire logbook.
- Emergency exits, fire alarm call points, fire appliances and assembly points are clearly sign posted with signs conforming to the "Health & Safety (Safety Signs and Signals) Regulations 1996. The locations of the above are identified on the school's site plan.
- Where activities are being provided by non-school/centre staff such as a third party provider, the school/centre will provide appropriate information, instruction and training on the establishment's emergency procedures and emergency contact details.
- All staff are considered to be fire marshals as they have specific responsibilities for assisting the safe evacuation of children and young people in their charge.
- Fire drills are carried out termly and performance recorded on the Fire drill evaluation sheet and retained in the fire logbook.
- The school will maintain an inventory of all substances on site within the fire log book and review this annually, indicating on plans their location within the building. All hazardous substances used in Science, Design Technology and Art must be stored in accordance with CLEAPSS guidance. www.cleapss.org.uk
- Displays- the Fire Authority recommends a maximum of 20% display of the total surface area, limiting display to 3m in length with a 1m fire break.
- All documentation relating to fire safety including inspection, service, maintenance and repair records will be maintained in the school's fire log book
- Emergency contact and key holder details are maintained by the Headteacher and provided to Wirral Community Patrol / remote call centre.
- The following local checks are carried out and logged by the Site Manager:
 - Daily checks of fire evacuation routes to ensure that they are clear
 - Weekly fire alarm call point tests
 - Monthly check of emergency lighting
 - Monthly Fire Marshal Inspection Checklist to include:
 - Fire doors to ensure they are in a good condition and easily opened
 - Emergency escape routes
 - Fire fighting equipment to ensure that it is the correct location and not discharged
- The following inspection and maintenance requirements are carried out by a contractor and inspection records/certificates are available:
 - Maintenance and service of the fire alarm system
 - Maintenance and inspection of the emergency lighting and batteries, including full discharge test.

- Annual firefighting equipment inspection
- 6 monthly testing of fire shutters and annual maintenance

4.4. Housekeeping

The Head teacher on behalf of the Governing Body is responsible for ensuring maintaining good standards of housekeeping across all areas of the school by carrying out site inspections. Areas include:

- Floors and Gangways:
 - Wet, greasy, dusty or dirty floors; spills or splashes of solids or liquids etc.
 - Unsuitable floor surface or covering; trailing cables; congestion; obstructions; inadequate lighting
- Furniture and Fittings
 - Check circulation routes are not impeded by the arrangement of furniture.
 - Check furniture is not damaged or unstable.
 - Check no furniture is in a dangerous condition, (rough wood, splinters,
 - protruding screws, nails, loose components etc
- Storage
 - Check accessibility, are shelf mountings secure, are shelves overloaded, are bulky items stored at waist height – not at high or low level, is storage logical and tidy, are storage areas kept secure, is access equipment available for high shelves egg kick stool or step ladder
- Waste
 - Are there adequate containers for disposal of waste, are they emptied regularly, check for waste accumulating on escape routes
- Welfare Facilities
 - Is there adequate storage for coats, personal belongings are facilities for making refreshments and eating snacks kept clean and tidy, is food stored in appropriate containers
- Fire
 - Flammable materials will kept away from heat and ignition sources, stored in approved
 - correctly labelled containers.
 - Fire exits, call points, fire extinguishers clearly marked, and free from obstruction.

4.5. Lighting

The Head teacher on behalf of the Governing Body will ensure that:

- Each room or other space within the school will have lighting appropriate to its normal use and which satisfies any more specific requirements.
- The maintained illuminance of teaching accommodation must not be less than 300 lux on the working plane.
- Where visually demanding tasks are carried out there must be maintained illuminance of not less than 500 lux on the working plane.

- Light fittings must not produce a glare index of more than 19, where glare index measures the direct glare from light fittings which might be seen, for example, by someone looking up from their work.
- It is the responsibility of all staff to report any defects so that appropriate repairs can be instigated.

4.6. General Building Risk Assessments

The Head teacher on behalf of the Governing Body will ensure that there are risk assessments for,

- Slip, Trip, Fall
- Movement around school
- Housekeeping
- Corridors and stairs
- Main Hall

This list is not exhaustive and other areas can be assessed based on the risks involved.

The risk assessments are to be reviewed on an annual basis or when there are changes to the building.

4.7. Security

The Head teacher on behalf of the Governing Body will ensure that that security of the site is risk assessed in order to provide a safe and secure environment for children, employees and visitors to

Governors and the head teacher will ensure:

- There is a Security risk assessment and all actions have been implemented.
- The risk assessment is on an annual basis or when there are changes to the building.
- If necessary expert advice is obtained to determine the security risks and precautions required to deal with them.
- The intruder alarm is monitored and inspected and records are available
- Employee are provided with enough resources, information and training to implement the security procedures.
- Ensure that all visitors, contractors and agency employee adhere to the security arrangements.

4.8. Extended Schools and Lettings

Governors and the head teacher will ensure any Lettings are managed by SBM following Local Authority Guidance.

5. GROUNDS

5.1. Vehicles on site and use of private vehicles

The Head teacher on behalf of the Governing Body recognise that the movement of vehicles presents a foreseeable risk in a school environment and will ensure: If pedestrian routes within the site are not clearly defined and segregated from vehicles a risk assessment should be in place demonstrating the controls in place to mitigate the risk to pedestrians.

- Vehicular access to the school is restricted to school staff and visitors only and not for general use by parents / guardians when bringing children to school or collecting them.
- School gates are kept shut between 9:05am-3:15pm
- Children's and parents' access shall be kept clear of vehicles
- Access from the road shall be kept clear for emergency vehicles.

5.2. External play equipment

The Head teacher on behalf of the Governing Body recognises that playground and sports equipment present foreseeable hazards in a school environment and will ensure:

- Risk assessments are undertaken to identify all hazards and control measures
- External play equipment will only be used when supervised.
- Daily visual inspections are carried out by Site Manager
- Pre-use inspections are carried out by all users
- Equipment should be checked daily by Site Manager for any apparent defects
- Termly formal inspections are carried out by Governors and recorded *
- Annual inspection will be carried out by a suitably competent contractor: [Sports and Playgrounds services]
- Records of all inspections to be kept on site.

* Or as recommended by the installer/manufacturer of the play equipment

5.3. Tree safety and grounds maintenance

The Head teacher on behalf of the Governing Body recognises that the grounds of the school can present significant hazards if not managed and maintained in a safe condition and will ensure that:

- Risk assessments are undertaken on the grounds and the maintenance activities that are carried out. e.g. leaf blowing, mowing, strimming
- Employees will only use equipment for which they are trained in line with the Provision & Use of Work Equipment Regulations 1999
- Professional tree inspections and maintenance are carried out where applicable and that records of this work are available.
- Visual grounds inspections and maintenance are carried out as necessary and that records are available.

5.4. General Grounds Risk Assessments

The Head teacher on behalf of the Governing Body will ensure that there are risk assessments for,

- Site Inspections (termly)
- Playgrounds
- Fields
- Ponds- **N/A for Pensby**

This list is not exhaustive and other areas can be assessed based on the risks involved.

New risk assessments are to be carried out an annual or termly basis or when there are changes to the grounds.

6. ROOMS

6.1. General Rooms Risk Assessments

Where required, the Head teacher on behalf of the Governing Body will ensure that there are risk assessments for,

- Classrooms
- Offices
- Finger trap
- Creche
- ICT
- Hydrotherapy Pool located at Stanley School
- Swimming pool located at Stanley School
- Kitchen

This list is not exhaustive and other areas can be assessed based on the risks involved.

The risk assessment is to be reviewed on an annual basis or when there are changes to the rooms.

7. TASKS

7.1. Chemical Safety- Control of substances hazardous to health (COSHH)

Under the Control of Substances Hazardous to Health Regulations 2002 the Head teacher on behalf of the Governing Body has a responsibility to ensure:

- Substances identified as presenting a significant risk with a hazard symbol (for example, swimming pool chemicals) have a specific COSHH risk assessment completed
- Hazardous substances and cleaning materials are sourced from an approved supplier in order to ensure non-hazardous substances or substances that present the lowest level of risk are used.
- There is an inventory of chemicals (e.g. cleaning and maintenance products, hazardous substances kept on site including science, biology, swimming pools etc.), reviewed in annually.
- Relevant Manufacturers Safety Data Sheets available for all cleaning/maintenance substances and these they been communicated to those employees who use them.
- Employees using the substances are appropriately competent.
- All hazardous substances stored appropriately e.g. secured out of the reach of children and all containers clearly labeled and marked (e.g. flammable materials stored in appropriate flammables cabinet)
- Personal protective clothing (PPE) is issued, maintained, examined and replaced when required. Records will be kept of issuing PPE (PPE1 form)
- if required health surveillance is available .

NOTE: substances used during Science and DT lessons will be covered by CLEAPSS risk assessments and advice

7.2. Work at Height –use of ladders and step ladders

In accordance with Working at Height Regulations 2005, the Head teacher on behalf of the Governing Body has a responsibility to ensure:

- Work at height will be avoided where it is reasonably practicable to do so.
- Where this is not possible e.g. putting up displays, changing light fittings, etc. Headteacher will ensure a risk assessment is conducted taking account of the fact that working from ladders and step ladders can only be carried for ,
 - 'low risk' activities, e.g. change a light bulb, putting up displays, etc
 - light work (up to 10kg) and
 - less than 30 minutes for any activity

Note: for more than 5 minutes duration for work above 2 meters and need to use mobile tower scaffolds

- Where this is not possible and there are site specific hazards, e.g. cleaning gutters, collecting balls from roofs, etc., Site Manager and SBM will ensure a

site specific risk assessment is conducted prior to carrying out the work and the risk reduced as far as is reasonably practicable including identifying measures for fragile roofs, guard rails, planning for emergencies and rescue, etc.

- A copy of the assessments will be provided to employees authorised to work at height.
- Employees who are required to work at height will receive appropriate training that will be refreshed every 3 years.
- Employees who are required to work at height will have access to appropriate equipment, e.g.
 - Foot stool (elephants foot) for teaching and support staff
 - Step ladders, ladders, platforms for the site team
- Employees who have access to the equipment will carry inspections prior to use.
- Regular inspections of all work at height equipment will be conducted by Site Manager. All equipment must be tagged/numbered and a ladder register maintained. Records will be kept.

7.3. Manual Handling

Under the Manual Handling Operations Regulations 1992 the Head teacher on behalf of the Governing Body will ensure all manual handling activities which present a significant risk to the health and safety of staff, whether they involve the manual handling of people or objects, will ensure:

- Where it is not reasonably practicable to eliminate these activities, a risk assessment involving objects or people will be carried out and the risk reduced as far as is reasonably practicable in accordance with the Manual Handling Operations 1992.
- When a risk assessment indicates that employees may be lifting loads above the recommended safe lifting levels, a specific assessment must be carried out identifying suitable control measures following the hierarchy of control.
- The assessment must be recorded in writing shared with employees.
- Specific training will be provided to employees that are required to carry out manual handling of loads and manual handling of people. For objects this needs to be refreshed every 3 years whilst for people it needs to be annually refreshed.
- Information and instruction is provided to employees on the health risks associated with manual handling.
- Employees are not expected to carry out manual handling operations which are unsafe or beyond their individual capabilities (managers must take account of employees concerns with regards to manual handling, reviewing the risk assessment if necessary).
- Any equipment provided to eliminate manual handling e.g. hoists, cranes, pallet trucks, etc are inspected as per the manufacturers recommendations

7.4. Lone working

The Head teacher on behalf of the Governing Body encourage employees not to work alone in the school and where it cannot be avoided.

- Work carried out unaccompanied or without immediate access to assistance should be risk assessed to determine if the proposed lone working activity is necessary.
- Obtain permission from the Head teacher/Centre Manager and notify him/her on each occasion when lone working will occur.
- Work involving potentially significant risks (for example work at height, operating dangerous equipment, etc) should not be undertaken whilst working alone.
- Ensure employees do not put themselves or others at risk.
- Ensure they have means to summon help in an emergency e.g. access to a telephone or mobile telephone etc.
- When working off site, (e.g. when visiting homes), notify a colleague of their whereabouts and the estimated time of return. (It is good practice to obtain background information about the child/family being visited and also to pre-plan the route if the premises are unfamiliar).

7.5. Driving

The Head teacher on behalf of the Governing Body recognises that employees who drive their own private vehicles while on work business or those that drive minibuses present a foreseeable risk in a school environment and will ensure:

- risk assessments have been undertaken to identify the hazards associated with driving private vehicles at work and the operation of school vehicles
- the validity of their licenses is checked annually and this information kept on file.

Employees who drive their private vehicle for work(this includes any activity in which a private vehicle is driven for the purpose of work, including travelling from the normal place of work to another location for a meeting) must also have the following checked and recorded annually using the CAR 10 form (or equivalent).

7.6. Minibuses

- Stanley School is responsible for undertaking checks on and the operation of minibuses in accordance with the Local Authority Guidance.
- It is a requirement for all minibus drivers to attend and pass the Wirral Council's minibus training. They are not authorised to drive the vehicle without this certificate. In addition formal authority to drive is required from the authority's transport division.

7.7. Violence & Aggression

The Head teacher on behalf of the Governing Body recognises that violence and aggression is a foreseeable hazard in a school environment and will ensure:

- Risk assessments are carried out to identify all possible situations and tasks during which violence and aggression may occur and what precautions are in place to reduce the likelihood. e.g. lone working, responding to intruder alarms, working with pupils with challenging behavior.
- Where it has been identified, employees will be provided with appropriate information, instruction and specific training for dealing with these situations e.g. Team Teach, MAPA, de-escalation training. Refresher training will be provided at a recommended interval.
- Suitable precautions are introduced e.g. zero tolerance notices, means of communication, CCTV, training.
- All incidents of physical assault from pupils where an injury is sustained by a member of staff or another pupil must be recorded on an M13 accident form.
- Any incidents of violence and aggression directed by third parties to staff are reported using form MV92 and follow guidance in the guidance below.
- Counselling is offered to employees following violent, aggressive or abusive behavior.

7.8. Noise

Under the Control of Noise at Work Regulations 2005 the Head teacher on behalf of the Governing Body will identify activities e.g. use of machinery, power tools, or petrol strimmer's by premises/caretaking staff, etc., that expose their employees and others to the damaging effects of noise e.g. hearing loss . A simple guide to establish whether a workplace requires a detailed noise risk assessment is:-

- Employees have to raise their voices to carry out a normal conversation when about 2m apart for any part of the day;
- Employees use noisy powered tools or machinery for more than half an hour each day (including employees and pupils in DT Departments);
- Employees are exposed to impact noises such as pneumatic impact tools or hammering;
- Employees and pupils playing of loud music in Music departments; and
- Employees have raised their concerns about noise levels within the service area and have requested the use of/or wear hearing protection.

It is the responsibility of Head teachers to ensure:

- A competent person carries out a suitable and sufficient noise risk assessment (Contact the Health, Safety & Resilience Team for support)
- New plant or equipment is assessed prior to procurement, for the lowest reasonable noise emitting levels. Head teachers should request specific information from manufacturers/suppliers prior to purchase/hire to ensure so far

as is reasonably practicable that noise exposure is below the 2nd action level and seek guidance from the HSR Team where this cannot be achieved.

- They prevent personal exposure to noise levels exceeding the upper exposure limit values.
- They provide employees (and pupils) with adequate hearing protection and enforce its use when noise levels are above the upper exposure action value, where such exposure cannot be reduced at source.
- Hearing protection is available to employees upon request when noise levels are above the lower exposure action value.
- They arrange routine noise health surveillance within their service area when the noise risk assessment indicates a risk to employees' health.
- They arrange pre-employment health screening for all new 'at risk' employees.
- 'At risk' employees within their service area are given suitable information, instruction, and training on noise risks and the appropriate controls.
- Any conflicting issues that they cannot resolve are escalated to a senior manager.

7.9. Vibration

Under the Control of Vibration at Work Regulations 2005 the Head teacher on behalf of the Governing Body will carry out risk assessments of any activities that expose their employees and others to the damaging effects of vibration e.g. hand arm vibration syndrome (HAVS). Such activities might include use of machinery, power tools, or petrol strimmer's by premises/caretaking staff.

- A competent person carries out a suitable and sufficient vibration risk assessment (contact The Health, Safety and Resilience Team for assistance).
- The risk assessment is reviewed annually or when you introduce new equipment or processes
- If your risk assessment indicates that employees may be exposed above the exposure limit value or the exposure action value, any control measures which you implement are based on the general principles of prevention
- If employees are likely to be exposed above the daily exposure value, immediate action is taken to reduce the exposure below the limit value
- Records are maintained identifying what vibrating equipment employees use and how often they use them Health surveillance is provided to employees who continue to be regularly exposed above the (EAV) and records are maintained (Contact The Health, Safety & Resilience Team for advice).
- Any health surveillance records are treated as confidential (and retained for a period of at least 50 years)
- Information and training is given to employees on health risks and the control measures which are in place.
- All new employees who are likely to be exposed to vibration complete the 'initial checklist' prior to undertaking their duties (contact Occupational Health Unit)
- All existing employees exposed to vibration complete the annual vibration checklist (contact Occupational Health Unit)

- Any new equipment which is procured has the lowest possible vibration magnitude, contact the manufacturers for this information

7.10. First Aid

The Head teacher on behalf of the Governing Body is responsible for ensuring that adequate first aid provision and first aid facilities are in place in line with the requirements of the Health & Safety (First Aid) Regulations 1981 and will nominate a First Aid Coordinator who will ensure that:

- A First Aid Needs Assessment is carried out in order to determine the provision of appropriate First Aiders during periods before and after the school day, during events, holidays and when lone working takes place.
- That First Aiders have a current certificate and that new persons are trained should first aiders leave.
- There are checks every term that the contents of first aid boxes and, if required, defibrillators are complete and replenished as necessary.
- A travel first aid kit is available and is taken by an appointed member of staff when taking a group of children out of school.

Where the first aider or Head teacher considers that hospital treatment is required the school should summon the emergency services for transport by ambulance. If, despite being fully appraised of the situation, the emergency service does not consider it necessary for transport by ambulance, but the school consider that further medical advice is required, the school should contact the pupil's next of kin. If the next of kin cannot be contacted and/or do not have access to own transport, the school can, **only** in these **exceptional** circumstances arrange to transport the injured person using their school staff transport.

Please note: they must be accompanied by an additional responsible adult to support the injured person. A member of staff should stay with the injured child until their parents/guardians arrive at the hospital.

7.11. General Tasks Risk Assessments

Where required, the Head teacher on behalf of the Governing Body will ensure that there are risk assessments for,

- Confined Spaces
- Adverse weather
- Working with Live Electrical Equipment
- Cleaning

This list is not exhaustive and other areas can be assessed based on the risks involved.

The risk assessment is to be reviewed on an annual basis or when there are changes.

8. EQUIPMENT

8.1. Safe use of Portable Electrical Appliances and Fixed Electrical Systems

The Head teacher on behalf of the Governing Body will ensure that portable and transportable (PAT) electrical equipment and fixed electrical systems are safe for use by employees and visitors by:

- Ensuring that there is an inventory of electrical appliances
- Portable and transportable electrical equipment is included in risk assessments
- All portable items of electrical equipment will be subject to PAT (portable appliance testing) in accordance with Local Authority Health and Safety Management Arrangements for Portable Appliance Testing and Inspection, conducted by Calbarrie
- There are records of formal test/inspection results for all electrical appliances.
- Employees who operate electrical equipment carry out visual checks prior to use.
- Personal items of equipment (electrical or mechanical) will not be brought into the school without prior authorisation and subjected to the same tests as school equipment.
- Manufacturer's instructions are available for higher risk electrical equipment and these are shared with staff.
- The fixed wiring and electrical system is inspected by an electrical contractor on a five yearly basis and the inspection reports are available. All remedial actions are completed.

8.2. Work Equipment / Lifting Equipment / Pressure Systems

Work equipment is almost any equipment used by an employee, pupil, and visitor whilst at work and includes:

- Machines such as circular saws, drills, photocopiers, mowers, strimmer's, leaf blowers
- Hand tools- screwdrivers, hammers, knives, chisels
- Lifting equipment- hoists, lifting slings, stair lifts, changing beds
- Other equipment such as ladder, trolleys, water pressure cleaners
- Includes equipment which employees provide for their own use at work.

Lifting equipment is any work equipment, including any lifting accessories, used in lifting operations, such as hoists, goods and passenger lifts, vehicle tail lifts fitted to vehicles, cleaning cradles and its suspension equipment, tele-handlers. The 'are relevant to all activities involving the lifting and lowering of loads, whether those loads are goods, equipment or people.

Pressure Systems are concerned with equipment or systems which contain steam at any pressure, gases which exert a pressure in excess of 0.5 bar above atmospheric pressure or fluids, which may be mixtures of liquids, gases and vapours where the gas or vapour phase may exert a pressure in excess of 0.5 bar above atmospheric pressure. This could include, but would not be limited to, items such as compressors, air receivers, autoclaves, boilers and steam heating systems, pressure cookers and steamers, coffee machines and process plant and equipment.

The Head teacher on behalf of the Governing Body recognises that even simple hand tools can cause serious injuries through misuse, lack of training or poor maintenance. In accordance with the Provision and Use of Workplace Equipment (PUWER) Regulations 1998, Lifting Operations and Lifting Equipment Regulations 1998 (LOLER) and the Pressure Systems Safety Regulations 2000 and will ensure:

- A risk assessment of equipment is undertaken to take into consideration:
 - The individual hazards presented by the equipment
 - Appropriate selection of equipment for the task
 - Use
 - Inspection
 - Maintenance
 - Training
- All equipment has conformity with EC requirements.
- Employees will only use equipment for which they have received adequate information, instruction and training.
Note: other than the CDT Dept, only basic DIY tools can be used, e.g. drills, sanders, jig saws, etc.
Prior permission must be given by the Health and Safety for operational staff to use higher-risk tools, e.g. angle grinders, circular saws, welding tools, wood turning lathes, chain saws, ride on mowers, etc.
- Only trained persons undertake any maintenance, repairs or modifications of work equipment.
- All dangerous parts of machinery/equipment designed with guards and protection devices are provided and used in line with manufacturers instructions.
- There are documented local safe systems of work for the use of the equipment.
- Relevant warning signs are displayed by the equipment.
- Trained users carry out pre-use inspections.
- There are documented periodical user checklists to inspect the equipment.
- Employees are required to report to Site Manager any problems found with plant/equipment, damaged electrical apparatus or wiring - including portable equipment and permanent wiring.
- Defective equipment will be clearly marked and taken out of service by storing in a secure location pending repair / disposal.
- All plant and equipment requiring statutory inspection and testing under health and safety legislation (i.e. steam boilers, compressors, lifting

equipment, local exhaust ventilation, pressure cookers etc) will be inspected by appropriate contractors/insurance company at specific intervals including,

- Maintenance and inspection of work equipment as required within the manufactures / suppliers' instructions.
- Detailed and thorough examination of lifting equipment who must then complete a written report. These examinations must be carried out before use for the first time, after assembly and before use at each location, and regularly, while in service, as follows:
 - 6 months, for lifting equipment and any associated accessories used to lift people
 - 6 months, for all lifting accessories
 - 12 months, for all other lifting equipment
- Whole-system maintenance programme for pressure systems that considers factors such as age, uses and the environment to be identified and detailed in a written scheme of examination. Where statutory inspections of pressure system is required, these should be entered onto a database so that arrangements for qualified inspectors to inspect the equipment or systems can be made: such inspections would need to repeated every 12 months.

8.3. PPE

In accordance with the Personal Protective Equipment Regulations 1992 (as amended) the Head teacher on behalf of the Governing Body will ensure that there are arrangements to ensure:

- A full risk assessment is carried out to identify specific hazards and the most appropriate risk controls.
- The assessment also identifies whether any PPE is required by employees to protect against residual risks.
- PPE is provided as a last resort, collective measures are preferable over individual measures (engineering controls, safe systems of work).
- Employees are not charged for PPE which they are issued with (including replacement PPE).
- Replacement PPE is readily available for those who require it and it is easily obtained.
- A signed record is available for the issuing of PPE to employees.
- A system is in place for the maintenance, testing and cleaning of PPE that follows the manufactures/suppliers instructions.
- Suitable storage is made available to prevent against damage, sunlight, heat, loss and contamination.
- All employees are provided with Information, instruction and training on the risk(s), which the PPE will protect, the correct application, use, maintenance and cleaning of PPE. (Manufacturers guidance is suitable).
- When issuing PPE you take account of the ergonomic factors of each individuals requirements e.g. beards, face size, hand size etc (not a one size fits all approach) and Face Fit Testing is carried out.

- The PPE does not create another hazard by wearing it (limiting visibility, movement).
- Any PPE which is provided to employees bears the CE mark.
- Employees are supervised to ensure they wear PPE, if PPE has been identified as a risk control measure then it must be worn at all times.

8.4. General Equipment Risk Assessments

Where required, the Head teacher on behalf of the Governing Body will ensure that there are risk assessments for,

- Passenger lifts
- Mobile tower

This list is not exhaustive and other areas can be assessed based on the risks involved.

The risk assessment is to be reviewed on an annual basis or when there are changes.

9. INDIVIDUAL

9.1. DSE - Display Screen Equipment

The Head teacher on behalf of the Governing Body is responsible for ensuring that all employees that are computer users complete the Display Screen Equipment Self-Assessment Checklist.

- Employees are considered to be computer users if DSE is normally used continuously for more than one hour every day as a significant part of their normal work
- Employees identified as DSE users shall be entitled to an eyesight test for DSE use every two years by a qualified optician (and corrective glasses if required specifically for DSE use).
- It is the responsibility of the Line Manager and individual to ensure that all remedial actions are completed within a reasonable time scale.

9.2. New and Expectant Mothers

The Head teacher on behalf of the Governing Body will ensure that risk assessments on new and expectant mothers will be undertaken by the respective line manager.

- It is the responsibility of staff to inform their line manager as soon as they know they are (or are no longer) pregnant.
- The risk assessment will be reviewed on a regular basis as the pregnancy progresses.

9.3. Stress Management

The Governors and Head teacher are committed to promoting high levels of health and wellbeing and recognise the importance of identifying and reducing workplace stressors.

- Stress risk assessments will be carried out by Headteacher annually
- The school will refer all employees who are absent from work to the OHU
- All employees have access to Occupational Health and counselling and advice. Where counselling is identified as a possible solution the employee is signposted to the Employee Assistance Programme (EAP) or equivalent.
- The school may need to take immediate action to review the employee's job role. Appropriate actions would be discussed with the employee affected to determine what work they feel they can undertake. Reasonable adjustments may be agreed and should be entered on form M34.1.

9.4. Supporting pupils at school with medical needs

The Governors and Head teacher will ensure that a Supporting Pupils at School with Medical Conditions policy and roles and procedures are in place in line with DfE guidance.

9.5. PEEP's

A personal emergency evacuation plan (PEEP) should be established with the co-operation of the person (and parents of pupils) with the impairment. The aim is to be sensitive to the needs of staff and to ensure that the dignity and safety of the member of staff is maintained at all times. All members of staff and pupils with impairment that might affect their ability to evacuate the building in an emergency should participate in a risk assessment that will determine the arrangements necessary to ensure their safe and speedy evacuation.

The Governors and Head teacher will ensure that PEEP's are conducted as required.

10. SUPPLEMENTARY AREAS

10.1. Emergency Planning

Definition: "An event – or events – usually sudden, which involve the experience of significant personal distress to a level which potentially overwhelms normal responses and procedures which is like to have emotional and organization consequences."

The Head teacher and SBM on behalf of the Governing Body will ensure that,

- There is an emergency management plan in place which firstly considers various types of emergency and how the school is placed to deal with them, and secondly to give the school community confidence when faced with a crisis.
- There are Lockdown procedures.
- Staff will be briefed on the contents of the school's emergency plan and their roles and responsibilities on induction and an annual refresher at the start of each school year.
- Training and exercising can help ensure it is fit for purpose and that the procedures outlined in the plan for dealing with an emergency can be carried out effectively if an emergency does occur. The school will carry out a tabletop exercise, simulating an emergency situation, at least once per year.

10.2. Contractor Management

The SBM on behalf of the Governing Body recognise that the use of contractors in the school environment has the potential to introduce additional hazards and risks that are not normally present and with the Site Manager will ensure:

- The suitability and competence of the contractor is established prior to appointments by the completion of a Pre-Qualification Questionnaire (contact Wirral Council Asset Management for schools buying 'AM SLA').
- Detailed risk assessments and method statements are provided by the contractor for the requested works.
- They obtain a permit to work or permission to undertake works which may involve hot work, working with asbestos, use of hazardous substances, roof access, etc
- Information, instruction and training is provided where necessary to contractors on anything which may affect their health and safety.
- The co-operation and communication between all parties involved, to ensure the health and safety of all the workplace and anyone who is likely to be
- All contractors must report to [school office / reception] where they will be asked to sign the visitors book and wear an identification badge.
- Contractors will be issued with guidance on fire procedures, asbestos management, local management health and safety arrangements and vehicle movement restrictions.

If the contractors work involves carrying out of any building, civil engineering or construction work, then it will fall within the remit of Construction (Design Management) Regulations 2015 and it is strongly recommended that advise and assistance is sought from Asset providers prior to commencing the work.

Cassidy & Ashton, Headteacher and SBM responsible is responsible for monitoring areas where the contractor's work may directly affect staff and pupils and for keeping records of all contractor work. This will include checking that

- Work is carried out in accordance with the risk assessment and method statement.
- They have sufficient knowledge of the work being undertaken in their building so that they can ensure the work is being managed and supervised.
- The contractor is escorted to their place of work and informed of local emergency procedures.
- They provide information including details of any risks that other parties could not reasonably know about [see asbestos management].
- They make staff aware of any works being undertaken and of any temporary hazards they may come into contact with.
- They report and accidents/incidents or near misses which contractors are involved in.
- They challenge any unsafe working practices.

If undertaking the role of Client under Construction (Design Management) Regulations 2015 the Head teacher on behalf of the Governing Body will ensure they have received suitable awareness training in the requirements of CDM 2015.

10.3. Clinical Waste

In accordance with the “Duty of Care” – Code of Practice all swabs, tissues etc used for first aid treatment will be placed in the medical bin located in disabled toilet.

Incontinence waste such as disposable nappies, stoma bag etc will be placed in the hazardous waste disposal unit in the disabled toilet.

Items such as needles, syringes and other sharps will be placed in the “sharps bin” located in individual classrooms as and when required.

Emergency Contact Numbers:

NHS	111
Arrowe Park Hospital	0151 678 5111
School Nurse	0151 514 6683
Infection control Nurse	0151 604 7750
Public Health England	0344 225 0562 opt 1opt 1

10.4. Supplementary Risk Assessments

Where required, the Head teacher on behalf of the Governing Body will ensure that there are risk assessments for,

- Special events
- Adverse weather conditions including working in the sun, cold/icy conditions, etc

This list is not exhaustive and other areas can be assessed based on the risks involved.

The risk assessment is to be reviewed on an annual basis or when there are changes.

