



H&S POLICY

Version:	V4- Replaces Previous Policy
Last updated:	Oct 2018
Next review:	Oct 2019 or when there is a change in circumstances, in work practices or the introduction of new legislation.
Drafted	Elaine Bowes
Signed	
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STATEMENT OF INTENT

The Organisation's Board of Directors, Governing Body and Headteacher and managers recognise and accept their responsibilities under statute, common and contract law. As a responsible employers and/or person in control of premises, the requirement to provide a safe and healthy environment for all employees, volunteers, service users and others affected by its activities is acknowledged.

The organisation is committed to managing risks by ensuring that risk assessments are undertaken, control measures implemented, and systems are continuously monitored and overseen by the Headteacher and reviewed and led by the Business Manager and Senior Leadership Team.

The organisation and arrangements which support the H&S Policy (day to day management of Health & Safety) are the responsibility of the Headteacher, the Business Manager and the Senior Leadership Team (supported by the Governing Body).

The policy will ensure compliance with all Health and Safety legislation and regulations and the Independent School Standards:

The SLT are responsible for:

1. Providing a safe and healthy working and learning environment and ensuring that premises are maintained in a safe condition;
2. Maintaining safe access to and from the premises;
3. Preventing accidents and work-related illness;
4. Assessing and controlling risks from curriculum and non-curriculum activities including offsite educational visits and off-site learning and education locations;
5. Complying with statutory requirements as a minimum;
6. Ensuring safe working methods and providing safe equipment;
7. Providing effective information, instruction and training;
8. Monitoring and reviewing systems to make sure they are effective;
9. Developing and maintaining a positive health and safety culture through communication and consultation with employees on health and safety matters;
10. Setting targets and objective to develop a culture of continuous improvement;
11. Ensuring a healthy working environment is maintained including adequate welfare facilities;
12. Ensuring adequate resources are made available for health and safety issues, so far as is reasonably practicable;
13. Ensuring safe use, handling and storage of substances at work.

The company will ensure adequate resources, including finance, is available to implement the policy.

The Directors, Governing Body and SLT are committed to this policy and all employees are required to comply. Everyone is encouraged to support the company's commitment to continuous improvement in the organisation's health and safety performance. For the policy document to be effectively implemented, the organisation requires the full co-operation of employees and others who use the premises.

This policy statement will be reviewed at least annually and revised as and when necessary.

The policy statement, together with the organisational structure and the following arrangement and procedures, has been approved by the organisation's Board of Directors.

Signed:

A handwritten signature in dark ink, appearing to read 'E. Baines'.

OBJECTIVE ACTION

Organisation – Introduction

In order to achieve compliance with the Statement of Intent the organisation's normal management structure will have additional responsibilities assigned to them as detailed on this part of the Policy Document.

The Duties of the Board of Directors

The Board of Directors has overall responsibility for ensuring compliance with this H&S Policy Document. In consultation with the Business Manager and Headteacher, the Directors will ensure that there are effective and enforceable arrangements for the provision of health and safety throughout the organisation. Assessment of the effectiveness of this document will be monitored via an independent annual health and safety audit, ensuring that any necessary revisions are made, and its implementation is monitored.

The Business Manager will arrange and facilitate Health and Safety Meetings which will be held 6 times a year, regular Health and Safety walk around checks of the sites, 3 times a year and report findings and recommendations to the SLT, who will pass recommendations to the Board.

The Business Manager will have overall responsibility for ensuring that risk assessments are completed, checked, recorded. And accessible to all employees.

The Business Manager will review the H&S Policy bi-annually.

Duties of the Headteacher

The Headteacher has overall responsibility for ensuring compliance with this H&S Policy Document and the Independent school standard, in partnership with the SLT and Business Manager. In particular, s/he will ensure that there are effective and enforceable arrangements for the provision of health and safety, periodically assessing the effectiveness of this document ensuring that any necessary revisions are made to determine the policy and monitor its implementation.

Duties of the Business Manager

The Business Manager has responsibility for supporting the Headteacher in ensuring that the policy is implemented, and the Independent School standards are complied with. To ensure that all employees have received appropriate training and that the whole organisation has adopted appropriate policies and procedures to develop and maintain working practices and conditions to ensure that health and safety standards are met at all times.

The Business Manager will organise and lead the health and safety section of the Employee Forum, which will be attended by the Headteacher, management representative and two employee representatives.

The Business Manager will manage the Facilities Lead and ensure that regular health and safety checks are completed, and any issues appropriately recorded, reported and actioned.

The Business Manager will carry out regular health and safety walk around checks of the sites, used by the company and record these appropriately.

Arrange the annual health and safety audit and bi-annual review the H&S Policy, with support from the independent Health and Safety advisors.

Ensure that all relevant risk assessments are completed and stored centrally.

Ensure that employees are appropriately trained.

To have oversight of the First Aid, and other health, safety and welfare policies.

Ensure health and safety forms part of inductions for new employees, volunteers, visitors and young people.

To liaise with the Competent Person and SLT

Duties of the Facilities Lead

Under the direction of the Business Manager and Headteacher, the Facilities Lead will have day to day responsibility for conducting/arranging Health and Safety checks, arranging repairs, ensuring this Policy is followed and that the Independent School Standards are complied with.

Any concerns to be notified to the Business Manager.

The Facilities Lead will be responsible for some risk assessments, as allocated by the Business Manager.

OBJECTIVE ACTION

The Duties of the Employees

All Employees have individual legal responsibilities to take reasonable care for the health and safety of themselves and for others who may be affected by their acts or omissions and must comply with the organisation's H&S Policy Document and procedures at all times. They must co-operate with the organisation's management in complying with relevant health and safety law, use all work equipment and substances in accordance with instruction, training and information received, report any hazardous situations and defects in equipment found in the work places, report all incidents in line with current incident reporting procedure, act in accordance with any specific health and safety training received, inform the organisation's Business Manager, directly in emergency situations and the staff forum on routine matters, of what they consider to be shortcomings in the organisation's health and safety arrangements and exercise good standards of housekeeping and cleanliness.

Any shortcomings found in the organisation's health and safety arrangements should be reported via the organisation's reporting systems.

Children and Young People

Our c&yp, in accordance with their age and aptitude, are expected to exercise some personal responsibility for the health and safety of themselves and others, observe standards of dress consistent with safety and/or hygiene, follow health and safety rules, including instructions given by employees during an emergency.

C&yp with SEND that may affect their ability to exercise personal responsibility must be supervised and supported appropriately. All c&yp are supported by high levels of staffing at all times and, where appropriate, individual support plans, risk assessments and behaviour improvement plans are in place.

Employees

H&S will form part of the induction process for all new starters.

Employees have a day to day responsibility for ensuring compliance with this H&S Policy document and ensuring all people under their control are aware of the general health and safety requirements of the organisation, in relation to matters which affect them. Teachers/leads are responsible for the immediate safety of their own classroom, learning areas and associated equipment and as such it is their responsibility to ensure that it is maintained to a high standard with respect to health and safety issues.

Where appropriate PEEP's are in place. All employees have a duty and responsibility to ensure that they are fully aware of an individual learner's health and safety needs and that this is appropriated shared and communicated with other employees/agencies. Employees must be fully conversant with details contained in individual PEEP's, Pupil Passports, behaviour improvement plans and risk assessments.

Temporary Employees

H&S will form part of the induction process for all new starters.

Temporary employees are provided with information and guidance which includes the H&S Policy document, Fire and Emergency Procedures etc. and are suitably inducted into their role. Temporary employees are directly accountable to their line manager.

All temporary employees are given induction and provided with copies of this H&S Policy document, Emergency Procedures, Child Protection regulations etc. All temporary employees are subject to satisfactory enhanced DBS check which is recorded on the single central record. The Business Manager and Headteacher must be made aware of all temporary employees on site so that all this information can be recorded.

Visitors

Visitors are required to sign in and out at the organisations reception using our Entry Sign system, reading through and accepting the information outlining their responsibilities in relation to safeguarding, health and safety and fire procedures whilst visiting our site.

Volunteers, work experience, work placement

Anyone volunteering, on work experience or work placements are provided with information and guidance which includes health and safety, fire and emergency procedures etc. They are directly accountable to the appropriate Manager, whilst on the organisation's sites.

The HR Manager, along with the Business Manager, has overall responsibility for all volunteers in organisation. All are given induction and provided with copies of this H&S Policy Document, emergency procedures, child protection regulations etc. and all are subject to satisfactory enhanced DBS check which is recorded on the single central record.

Off-site venues and Educational Visits

The Business Manager will ensure that all Health and Safety regulations and standards for offsite venues and educational visits are followed, including that adequate risk assessments and insurances are in place.

Logging Health and safety concerns

There is a logging system in place to notify the Facilities Lead of any health and safety concerns that he can rectify, such as minor defects and repairs, storage of materials etc. Anything more significant should be reported to the Business Manager.

ARRANGEMENTS

The following procedures and arrangements have been established within the to minimise health and safety risks to an acceptable level.

The Organisation recognises the importance of communication to employees, visitors, learners, parents/carers, volunteers, contractors etc:

Everyone who comes to work in organisation will receive an induction from the Business Manage, including copies of important policies and training. Employees are updated at the start of each academic year regarding health and safety and receive annual child protection training. All employees will be made aware of the Designated Safeguarding Leads.

All policies are on the shared drive and all employees are given a log in for the network. Other information is shared by e-mail, during employee meetings or other training sessions.

Employees Health and Safety

A confidential, Employee Assistance provision is in place where employees can self-refer.

Return to work interviews following sickness absence are routine.

Employees have regular supervision were health and safety issues are discussed

All employees are aware of the 'logging' system to report any issues about health and safety issues.

All employees receive appropriate training

Employees representatives sit on the health and safety committee

Procedures

The following procedures and arrangements have been established which minimise health and safety risks to an acceptable level.

Responsibility of: Headteacher

Action/Arrangements: overall responsibility for health and safety to ensure compliance.

Risk Assessments: overall responsibility to ensure compliance

Responsibility of: Aegis Consultants, 'Competent Person' status

Action/Arrangements: annual audit to identify and assess risk. Telephone helpline

Risk Assessments: Audit of Risk Assessments. Annual Risk Assessment Awareness Training

Responsibility of: Business Manager

Action/Arrangements: overall responsibility for the implementation of health and safety procedures to ensure compliance.

Risk Assessments: Write risk assessments, were appropriate, and ensure all activities and venues are risk assessed. Risk assessments are stored and regularly reviewed.

Responsibility of: Facilities Lead

Action/Arrangements: responsible for carrying out routine health and safety checks, recording, reporting and actions from any issues that arise, to ensure compliance.

The organisation uses a risk assessment process and template as a standard for risk assessment. Those responsible for curriculum areas must ensure that risk assessments are in place for significant activities. Risk assessments are reviewed periodically or where there is a change in circumstances.

All curriculum risk assessments are signed and dated by the Headteacher and all non-curriculum risk assessments are signed and dated by the Business Manager. All c&yp risk assessments are signed and dated by a Wellbeing and Safety Lead. Periodically the Chair of Governors checks and signs the risk assessments. The Business Manager distributes regular updates from the HSE and other relevant information.

Organisation Educational Visits/Offsite Provision

The organisation complies with the DFE guidance on offsite educational visits and organisation journeys.

RISK ASSESSMENTS

The following procedures and processes are in place in organisation to minimise health and safety risks to an acceptable level.

Working at Height

The risks associated with working at height are identified through risk assessment. Frequent documented checks take place to ensure the safe working condition of access equipment. Procedures are in place to ensure any damaged access equipment is clearly labelled and removed as soon as practicable. The organisation discusses and agrees arrangements with employees. Where members of employees have pre-existing medical conditions or other factors which may affect their ability to use access equipment, a separate risk assessment is in place. Employees also have a responsibility to ensure their own health and safety and assist in the operation of any systems designed to provide for their safety.

Organisation provides safety ladders for employees to use if needed. Ladder checks are carried out annually by the Facilities lead, overseen by the Business Manager.

Violence to Employees

The organisation is aware of their responsibility for assessing the risks of violence to employees and, where violence is identified as a significant risk, the organisation ensure appropriate control measures are put in place. Employees report any incident of aggression or violence (or near misses) directed to themselves through the Behaviour Watch reporting process.

All c&yp have individual risk assessments and behaviour improvement plans. The organisation has a Wellbeing Team; the Head of Wellbeing has the overall responsibility for behaviour and allocating employees to work with identified c&yp. There is a written Positive Behaviour policy which has been circulated to all employees and relevant employees have received Team Teach and Manual Handling training which is updated as appropriate.

Security Arrangements including Dealing with Intruders

Risks to the security of the premises are assessed through the risk assessment process.

Responsibility of the Facilities Lead to ensure that employees are aware of the procedure for logging any concerns.

Personal Security/Lone Working

The organisation ensures that lone working is risk assessed and that appropriate control measures are put in place to mitigate those risks. Employees assist in the operation of any systems designed to provide for their safety.

There is a Lone Working Policy and Risk Assessment in place which is reviewed annually by the Headteacher and Business Manager, with support from the HR Manager.

Hazardous Substances (Control of Substances Hazardous to Health COSHH)

Where hazardous substances are used the Business Manager carries out risk assessments and adopts 'hierarchy of control measures' to seeking to eliminate or substitute the risk first and foremost.

The Business Manager and Facilities Manager oversee COSHH substances held in organisation and develop a control/monitoring system.

Personal Protective Equipment (PPE)

The Business Manager and SLT assess, on the basis of risk assessment and COSHH assessments, where there is a need for PPE as a control measure. Where it is assessed that PPE is required PPE is appropriately selected and provided. A record will be maintained by the Facilities Lead, which includes details of any expiry dates to ensure equipment is replaced as and when necessary. Employees are responsible for ensuring that they use PPE where it is provided and report any issues in a timely manner.

Organisation Transport

Risks associated with driving are evaluated within the Transport Risk Assessments.

A vehicle insurance policy is held for fleet vehicles via DE Ford, Insurance Brokers. The Facilities Lead is responsible for ensuring our vehicles have regular safety checks and services.

Where employees drive fleet, vehicles a copy of their Driving Licences is held on their HR files. These are reviewed annually.

Where employees use their own vehicles copies of driving licences, MOT and Business Insurance are held on HR files. These are reviewed annually.

Claims experience is used to monitor employees driving of vehicles.

Manual Handling (typical loads and handling learners)

Risks of manual handling are communicated within general risk assessments.

Any activities that involve significant manual handling tasks are risk assessed and where appropriate training provided for employees. The Headteacher is responsible for assessing the appropriate approach to handling tasks.

Relevant employees receive manual handling training.

Curriculum Safety (including extended activities/study support)

Teachers ensure that risks related to curriculum areas are identified and controlled following the National Health and Safety and Safeguarding Guidelines. For any activity falling outside of National Guidance a risk assessment is carried out.

Equipment

All equipment is regularly maintained, copies of certificates are held within the premises log book.

Work Experience Placements

Work experience co-ordinators follow the working practices outlined in: 'Work-related learning and the law, guidance for organisations and organisation-business link practitioners' and 'Work experience a guide for secondary organisations'.

The organisation follows the working practices of both documents.

Display Screen Equipment (DSE)

The majority of employees within the organisation are not considered to be DSE users. The Business Manager ensures that DSE workplace assessments are conducted for all users. DSA assessments are reviewed annually and where equipment changes, or office layouts change or when there are employees changes.

DSE assessments are completed by relevant employees and reviewed annually or if there are changes to layout/employees. Documents are stored on HR files.

SECTION 2 – PREMISES

Mechanical and Electrical (fixed and portable)

The organisation takes appropriate measures to make sure that all electrical equipment is safe and suitable for the purpose intended. All relevant people are made aware of the associated hazards and of the requirements to adopt working procedures designed to keep the risks to their health and to the health of another person, as low as reasonably achievable.

People carrying out the testing and/or repair of electrical equipment or carrying out experimental work on electrical equipment or its associated connections have the appropriate technical knowledge, training and information to enable them to work safely. Results of electrical safety tests (PAT testing, FAT testing and fixed wiring inspections) are recorded and held in the premises file.

Equipment is inspected during health and safety walk arounds and employees know the procedure in place for logging any concerns regarding equipment. Equipment is maintained in accordance with HSE regulations and copies of certificates are held in the premises log book.

Maintenance of Machinery and Equipment

The organisation inspects and maintains its equipment on a regular basis; the frequency of these inspections is dependent on the use and type of equipment.

Equipment is inspected during health and safety walk arounds and employees know the procedure in place for logging issue and concerns regarding equipment. Equipment is maintained in accordance with the HSE regulations and copies of certificates are held in the premises log book.

Asbestos

- To minimise risk from asbestos containing materials on the organisation site, the organisation maintains a safe and healthy environment by:
- Complying with all regulations concerning the control of asbestos;
- Where necessary communicating to all employees and visitors where asbestos containing materials are located within the organisation site;
- Most up to date asbestos report kept in the premises file and
- Liaising with the Landlord

Service Contractors

Service contractors have regular access to site as specified by a contract. The service contract specifies what work is expected of them and what they can expect from the organisation. Contractors follow their own safe systems of work and their working methods taking into account how they will impact upon employees, students and other visitors on site. The organisation provides details of its safe systems of work to the contractors where relevant and all contractors are consulted over emergency arrangements. A copy of this policy is available to them.

Building Contractors

This involves work where part of the site is handed over to the contractor. Hazards associated with this activity are controlled by effective supervision of students and contractors whilst on the organisation site.

Responsibility lies with the contractor. Works would not take place during organisation hours if complete separation from learners and employees was required and could not be achieved.

Small Scale Building Works – responsibility lies with the Facilities Lead

This includes day to day maintenance work and all work undertaken on site where a pre-site meeting has not taken place.

Slips/Trips/Falls

The organisation recognises the main cause of accidents is slips, trips and falls. It is the responsibility of the teacher to ensure that their classroom has clear traffic routes and that exit routes are kept clear. The Business Manager ensures regular inspection of communal areas. All hazards, obstructions, spillages, defects or maintenance requirements are reported to the through the reporting process. All employees are expected to be vigilant and aware of possible hazards.

All employees are aware of the need for high levels of health and safety in and around the premises. The Business Manager and Headteacher conduct regular health and safety walk arounds logging issues with the Facilities Lead, so that they can be resolved. Governors have appointed a health and safety link governor who is a member of the Health and Safety Committee together with the Head and Business Manager. Employees are aware of the procedure for reporting issues and concerns and are aware that all health and safety concerns should be directed to the Facilities Manager. We have accident forms to log all accidents/incidents and near miss form which can be completed as and when necessary. Data from these forms is reported to the Business Manager and Headteacher.

Cleaning

A cleaning schedule is in place which is monitored by the Facilities Lead. The cleaning is sub-contracted to a private company. All waste is disposed of according to appropriate health and safety guidelines. Deep cleaning is undertaken on a regular basis where necessary. The organisation ensures general cleanliness, appropriate waste disposal, safe stacking and storage and the checking of general equipment such as ladders etc. All members of employees and c&yp are encouraged to adopt good housekeeping practices to assist in the maintenance of a safe and healthy workplace.

Employees are aware, through induction and training, of the expectations regarding maintaining a safe and healthy workplace.

Organisation Kitchens

The organisation's kitchens should be cleaned and tidied after use. All washing up returned to the correct cupboards. Employees should encourage c&yp to address hygiene issues and wipe all surfaces and appliances before use, wash hands and wear aprons.

Caretaking and Grounds Maintenance (and grounds safety)

The organisation identifies risks associated with caretaking and grounds maintenance and identifies the risks through the risk assessment process.

All employees are aware of the procedure to use to notify the Facilities Lead of any issues/concerns regarding these areas and that the Business Manager should be notified of any matters relating to health and safety.

Gas and Electrical Appliances

Any necessary work and testing of gas and electrical appliances are carried out by qualified contractors. Gas and electrical appliances are also checked visually on a regular basis and subject to appropriate formal inspection.

This is the responsibility of the contractors; copies of maintenance certificates which are held in the premises log book.

The Landlord has responsibility for checking gas appliances and other installations which form part of the fabric of the building.

Water Supply/Legionella

An effective water hygiene management plan is in place to control the risks of legionellosis to employees and members of the public. The names Facilities Lead has a clear understanding of their duty, has undertaken training in water system management and has the competence and knowledge to ensure that all operational procedures are carried out in a timely and effective manner. A legionella risk assessment has been documented and the site log book is used. A process is also in place to deal with any actions should they arise.

Snow and Ice Gritting – responsible person facilities manager

Adequate arrangements are in place to minimise the risks from snow and ice on site e.g. access/egress routes. A risk assessment has been carried out and an emergency plan has been developed to determine what type of action needs to be undertaken during adverse weather conditions. There is suitable storage for salt/grit and tools (such as wheeled grit spreader) on site and a sufficient supply of salt/grit is available.

MEDICAL/FIRE AND EMERGENCY ARRANGEMENTS

Infectious Diseases

The organisation follows the National Guidance produced by the Health Protection Agency, which is summarised on the poster, 'Guidance on Infection Control in Organisations and other Child Care Settings'.

Posters are on display.

Medication

All medications are kept in a locked cabinet in the medical room. Medication must be administered in strict accordance with written instructions and their use properly recorded. Each learner requiring regular medication has a completed health care plan that is regularly reviewed by the Wellbeing and safety Lead. All medication sent to organisation must have the c&yp's name on the outside, clearly state the dose and time to be given and the medication is dated. All new medication must have the parent/carers's written consent for the organisation to administer it. (see medication policy)

Dealing with Medical Conditions

The organisation accommodates c&yp with medical needs wherever practicable and makes references to DFE circular – Supporting learners with Medical Needs in Organisation which sets out the legal framework for the health and safety of young people and employees. Information about individual c&yp's medical needs are clearly stated within individual Pupil Passports. Every person involved with young people with medical needs is aware of what is expected of them. Close co-operation between organisation, parents/carers, health professionals and other agencies help provide a suitable supportive environment for those young people with special medical needs.

We have qualified first aiders on site. C&yp have individual Pupil Passports and risk assessments. Individual pupil needs are shared regularly with employees.

First Aid

As per the First Aid Policy, the organisation follows the statutory requirements for first aid and provides suitably trained employees.

Reporting of Accidents

All employees are encouraged to report accidents, incidents and near misses and Senior Leaders or the Business Manager investigates such incidents and identifies and implements means to prevent a recurrence.

All staff accidents are reported via accident book, scanned and stored on the HR system, in compliance with data protection/GDPR. Any accidents involving YP are recorded on Behaviour Watch.

The organisation reports RIDDOR to the HSE as required.

Accident/incident statistics are reported to the Governing Body.

Fire Safety and Emergency Evacuation

A Fire Risk Assessment is carried out annually.

The fire risk assessments are working documents and updated regularly. Regular fire drills are held on each site. The Head Teacher works closely with the Business Manager and Facilities Lead to monitor and improve procedures constantly. The premises have a zoned fire alarm. The Landlord and the Facilities Lead carry out regular checks of the fire alarm and emergency lighting.

TRAINING

Employees Health and Safety Training and Competence

The organisation is committed to ensuring that employees are competent to undertake the roles expected of them. The Headteacher and Business Manager undertake a training needs analysis to identify the competency requirements of specific job roles in terms of health and safety and ensure that appropriate training records are held centrally. The training need analysis is reviewed on an annual basis or on the introduction of new legislation. Line managers conducting the supervision process consider health and safety performance and address areas of concerns with employees.

Supply and Student Teachers

The organisation does not routinely use supply employees. However, if they were to be employed expectations will be made clear to the supply teacher through induction information. Teachers on supply and student teachers are given a copy of the H&S Policy document and other relevant policies. The Headteacher, or a member of employees to whom the Headteacher delegates this, is responsible for liaising with the supply/student teacher on general requirements and routines.

Employees are issued with the Code of Conduct document which they sign and is kept in their HR file.

MONITORING AND REVIEWING

Arrangements are monitored and reviewed annually and revised as new topics arise that may affect the process of managing health and safety for employees, learners, contractors and other visitors.

We have a policy review cycle in place ensuring policies are updated and reviewed when due. Headteacher and Business Manager are creating a spreadsheet for a rolling health and safety plan.

Inspections

Regular safety inspections are carried out by the Facilities Lead. All hazards and risks associated with the premises/departments/ grounds are monitored and controlled.

The Headteacher and Business Manager have delegated responsibility for health and safety and conduct regular health and safety walk arounds. All employees have a responsibility to notify the Facilities Lead of any shortcomings they find in health and safety practices. The Facilities Lead will alert the Business Manager to any serious issues. All employees are aware of the procedure to use to notify the Facilities Lead of any issues/concerns regarding the building and to notify the Facilities Lead regarding any issues/concerns regarding health and safety around the premises.

Auditing

As a means of confirming that the necessary systems to comply with legislation are in place and being followed there is an annual health and safety audit by the Competent Person. The action points identified through the audit form part of the organisation development plan.