



Health and Safety Policy

Approved by:	Headteacher	Date: September 2026
Review by:	September 2027	

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1. Aims and scope

ReFocus is committed to providing and maintaining a safe and healthy environment for pupils, staff, visitors, contractors and others who may be affected by its activities. Health and safety is part of normal leadership, planning and day-to-day practice and will be managed proportionately to the risks involved.

- provide and maintain safe premises, equipment and systems of work;
- identify hazards, assess risk and implement effective control measures;
- provide appropriate information, instruction, supervision and training;
- maintain suitable emergency arrangements and learn from incidents and near misses;
- consult staff and take account of the needs of pupils, including SEND, disability, medical and communication needs; and
- comply with applicable health and safety law and the Independent School Standards.

2. Legal and regulatory framework

This policy has regard to current Department for Education (DfE), Health and Safety Executive (HSE), UK Health Security Agency (UKHSA) and other relevant government guidance, and to legislation including, where applicable:

- Health and Safety at Work etc. Act 1974;
- Management of Health and Safety at Work Regulations 1999;
- Education (Independent School Standards) Regulations 2014 and current DfE guidance for independent schools;
- Regulatory Reform (Fire Safety) Order 2005;
- Control of Substances Hazardous to Health Regulations 2002;
- Control of Asbestos Regulations 2012;
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR);
- Work at Height Regulations 2005;
- Manual Handling Operations Regulations 1992;
- Provision and Use of Work Equipment Regulations 1998;
- Electricity at Work Regulations 1989;
- Gas Safety (Installation and Use) Regulations 1998;
- Health and Safety (Display Screen Equipment) Regulations 1992;
- Health and Safety (First-Aid) Regulations 1981;
- Equality Act 2010; and
- Terrorism (Protection of Premises) Act 2025 (Martyn's Law), noting that its duties are subject to commencement and applicability.

For an independent school, the proprietor is accountable for health and safety. Day-to-day implementation may be delegated to the Headteacher and senior leaders, but accountability is not transferred by delegation.

3. Health and safety management and risk assessment

Health and safety risks are assessed and managed in accordance with the ReFocus Risk Assessment Policy. This policy does not create a separate risk-assessment system.

- The school's central risk-assessment register identifies applicable assessments, responsible owners, current versions, review dates and overdue actions.
- Risk assessments will be suitable and sufficient, proportionate to the activity and completed by a competent person.
- Controls will follow the hierarchy set out in the Risk Assessment Policy: eliminate; substitute or reduce exposure; use physical or engineering controls; use systems, staffing, supervision and training; and use personal protective equipment where necessary.
- Assessments will be reviewed at the stated date and sooner following material change, new information, an incident or near miss, control failure or a relevant concern.
- Significant findings and actions will be communicated to those who need to implement them. Serious and imminent danger requires immediate protective action.

4. Roles and responsibilities

4.1 Proprietor

- retains overall accountability as proprietor and, where applicable, employer;
- ensures suitable resources, competent advice and oversight are available;
- approves this policy and receives assurance on significant risks, incidents and overdue actions; and
- ensures that the Independent School Standards and applicable health and safety duties are met.

4.2 Headteacher and Senior Leadership Team

- lead day-to-day implementation of this policy and ensure responsibilities are clearly allocated;
- ensure suitable supervision, staffing and emergency arrangements;
- ensure premises and equipment are appropriately inspected, maintained and repaired;
- ensure significant risks and actions are escalated and controlled;
- ensure staff receive appropriate information, instruction and training; and
- ensure responsibilities are delegated to an appropriate senior leader during absence.

4.3 Health and Safety Lead

The current nominated Health and Safety Lead is Liam Kerr. The Health and Safety Lead coordinates the school's health and safety arrangements, supports risk assessment and monitoring, maintains relevant records and reports material concerns to the Headteacher. Specialist assessments and technical work will be undertaken by competent persons where required.

4.4 Staff and volunteers

- reasonably care for their own health and safety and that of others affected by their actions;
- follow training, instructions, risk controls and emergency procedures;
- report hazards, defects, incidents, near misses and significant changes promptly;
- use equipment and personal protective equipment correctly; and
- stop or modify an activity and seek support where there is serious and imminent danger or they are not competent to proceed safely.

4.5 Pupils and parents or carers

Pupils and parents or carers will be given accessible information about relevant safety arrangements and are expected to follow reasonable instructions and report concerns. They will be involved in individual planning where appropriate. This does not transfer the school's legal responsibilities to them.

4.6 Contractors

Contractors must agree safe working arrangements before work begins, provide suitable risk assessments and method statements where required, demonstrate appropriate competence and insurance, and follow ReFocus site, safeguarding and emergency procedures. Relevant asbestos, fire and other premises information will be provided before work that may be affected by it.

5. Premises, site security and contractors

ReFocus will maintain premises so that, so far as is reasonably practicable, they are safe, secure and suitable for their intended use. Site checks, maintenance records and statutory inspections will be coordinated through the responsible site lead and recorded appropriately.

- Access, exits, circulation routes and external areas will be kept appropriately secure and free from avoidable obstruction.
- Defects presenting significant risk will be isolated, repaired or otherwise controlled promptly.
- Intruder, fire and other relevant alarm systems will be tested and maintained in accordance with suitable schedules.
- Key-holder and emergency response arrangements will be maintained for each site.
- Contractors and visitors will be managed in accordance with site security and safeguarding requirements.

6. Fire and emergency arrangements

A suitable and sufficient fire risk assessment will be maintained for each site and completed or reviewed by a competent person. ReFocus remains responsible for ensuring that identified actions are implemented even where assessment or servicing is undertaken by an external contractor.

- Emergency exits, escape routes, assembly points and fire-fighting equipment will be appropriately signed, maintained and kept accessible.
- Fire alarms will be tested routinely and evacuation drills will normally be undertaken at least once each term.
- New staff will receive fire-safety information as part of induction and pupils will be made aware of relevant arrangements.
- People who may require assistance to evacuate will have appropriate arrangements, including a Personal Emergency Evacuation Plan (PEEP) where necessary.
- No person should attempt to fight a fire unless trained, competent and able to do so without putting themselves or others at risk.

6.1 In the event of fire or other emergency

- Raise the alarm and begin the relevant emergency procedure without delay.
- Call the emergency services where required.
- Evacuate to the designated assembly point unless an alternative emergency instruction is given.
- Complete pupil, staff and visitor checks using the available attendance information.
- Do not re-enter until authorised by the emergency services or other competent person.

The current assembly points are: Knox Road – Knox Road car park; Rose Cottage – paved area to the rear of the property off Commercial Way. Site-specific emergency information will be kept under review and communicated to staff.

6.2 Security incidents and Martyn's Law preparedness

The Terrorism (Protection of Premises) Act 2025 (Martyn's Law) has been enacted but its duties are subject to commencement and whether a premises falls within scope. ReFocus will keep its position under review as implementation progresses and will comply with applicable requirements when they come into force.

Irrespective of statutory scope, ReFocus will maintain proportionate preparedness arrangements for the safety of pupils and staff. These will include, as appropriate, evacuation, invacuation, lockdown and communication arrangements, and will be read alongside the school's critical incident and safeguarding procedures.

7. Control of substances hazardous to health (COSHH)

Hazardous substances will be avoided or substituted where reasonably practicable. Where their use is necessary, a COSHH assessment will identify the hazards, people at risk, exposure routes and suitable controls.

- Hazardous products will be stored securely, labelled appropriately and, wherever possible, kept in their original containers.
- Safety data and manufacturer instructions will be available where relevant.
- Only staff who have received suitable information or training will use higher-risk substances or equipment.
- Engineering or organisational controls will be preferred to reliance on personal protective equipment alone.
- Appropriate personal protective equipment will be provided where required by the assessment.
- Spillages, exposure incidents and disposal will be managed in accordance with the relevant assessment and product guidance.

8. Water hygiene and legionella

ReFocus will maintain a current assessment of foreseeable risks from legionella and other water-hygiene hazards for each applicable site. A competent person will identify the control measures required and these will be implemented and recorded in the relevant water-hygiene log.

- Routine controls may include flushing, temperature monitoring, outlet management, cleaning, sampling or other measures identified by the competent assessment.
- The assessment and control arrangements will be reviewed regularly and specifically where there is reason to believe they may no longer be valid, including after significant changes to the water system, building use or identified controls.
- Actions and remedial work identified through monitoring or assessment will be recorded and completed within an appropriate timescale.

9. Asbestos

ReFocus will comply with the Control of Asbestos Regulations 2012 and relevant HSE duty-to-manage guidance. Current survey information and asbestos records for each site will be retained, made available to those who need them and reviewed as required.

Where asbestos-containing materials (ACMs) are identified or presumed, they will be recorded, risk assessed and managed through appropriate control and management arrangements. Where professional survey information identifies no ACMs in the areas surveyed, that information will be retained as evidence and kept under review in light of building work, new information or changes in condition.

- Before maintenance, refurbishment or other intrusive work begins, relevant survey and register information will be checked and provided to the contractor or person undertaking the work.
- Any areas not covered by suitable survey information will be treated cautiously and, where required, assessed before work proceeds.
- If material suspected of containing asbestos is disturbed or discovered, work will stop and the area will be made safe pending competent advice.
- Where an asbestos management plan is required, it will be implemented, kept current and reviewed at least annually and sooner following relevant change or deterioration.

10. Gas, electricity, equipment and display screen equipment

10.1 Gas safety

Gas appliances, pipework and flues will be installed, maintained and repaired by competent Gas Safe registered engineers where required. Relevant appliances and ventilation arrangements will be checked and maintained in accordance with applicable requirements and manufacturer guidance.

10.2 Electrical and work equipment

- Equipment will be selected, installed, used and maintained so that it is suitable for its intended purpose.
- Staff must use electrical equipment sensibly, report defects promptly and remove unsafe items from use where appropriate.
- Inspection and testing, including portable appliance testing where indicated by risk, will be undertaken by competent persons at appropriate intervals.
- Permanent electrical installation, repair or disconnection work will be carried out only by competent persons.
- Pupils will use equipment only under appropriate supervision and in accordance with curriculum risk assessments.

10.3 Display screen equipment (DSE)

Staff who are DSE users will have access to suitable workstation assessment, information and adjustments. Assessments will be reviewed when workstations or equipment change materially, when an individual reports relevant discomfort or health concerns, or otherwise where the assessment may no longer be valid.

- Workstations will be arranged to support suitable posture and safe use.
- Work will be organised to allow breaks or changes of activity from prolonged screen work.
- DSE users may request an eyesight test in accordance with the regulations.
- Where special corrective appliances are required specifically for DSE work, ReFocus will meet the applicable cost in accordance with its arrangements.

11. Lone working and personal safety

Lone working will be avoided where the task or circumstances make it unsuitable. Where lone working is necessary, the foreseeable risks will be assessed and proportionate controls put in place.

- An agreed school check-in, contact and escalation arrangement will be used where risk warrants it.
- Home visits, site visits, late working and other higher-risk lone-working situations will be specifically considered.
- Activities involving significant risk of falls, violence, hazardous substances, dangerous equipment or other risks that cannot be adequately controlled will not be undertaken alone.
- Staff must consider their competence and any relevant health or personal-safety needs and seek support where necessary.

12. Work at height

Work at height will be avoided where reasonably practicable. Where it is necessary, it will be planned, risk assessed, supervised as appropriate and undertaken by competent people using suitable equipment.

- Ladders and access equipment will be appropriate for the task, inspected before use and stored securely.

- Pupils must not use ladders unless this forms part of a specifically risk-assessed, supervised educational activity.
- Roof access and other higher-risk work at height is restricted to authorised and competent persons.
- Contractors are responsible for providing and safely using suitable access equipment for their work unless otherwise agreed.

13. Manual handling

Manual handling will be avoided where reasonably practicable and assessed where there is a foreseeable risk of injury. Mechanical aids, team handling or alternative methods will be used where appropriate.

- Plan the task, route and destination before lifting or moving a load.
- Consider the load, individual capability, task and environment.
- Ask for assistance where the load is awkward, unstable or beyond the individual's safe capability.
- Use suitable handling techniques and available mechanical aids.
- Staff undertaking higher-risk handling will receive appropriate training or instruction.

14. Educational visits, off-site activity and transport

Educational visits and off-site activities will be planned in accordance with the ReFocus Risk Assessment Policy and relevant school procedures. Routine low-risk activity may be managed through established procedures; unusual, significant or changing risks require specific assessment and appropriate approval.

- Planning will consider supervision, safeguarding, SEND and medical needs, transport, external providers, emergency communication, consent where required and contingencies.
- Appropriate first-aid provision will be available, reflecting the needs of the activity and pupils involved.
- Staff will have suitable emergency contact information and access to a school communication method.
- Transporting pupils on school business will follow the driver authorisation and single-pupil transport controls set out in the Risk Assessment Policy.

15. Lettings

This policy applies to any letting or third-party use of ReFocus premises. Hirers will be informed of relevant site, fire, emergency and safeguarding arrangements and will be responsible for complying with the conditions of hire and applicable law. ReFocus will clarify responsibilities before the letting begins.

16. Violence, aggression and occupational stress

16.1 Violence and aggression

ReFocus will not tolerate violent, abusive or threatening behaviour towards staff. Incidents and near misses will be reported, recorded and reviewed so that risks and controls can be updated. Individual pupil planning will be child-centred and will link to the Behaviour, Safeguarding and Risk Assessment policies where relevant.

16.2 Work-related stress

ReFocus recognises work-related stress as a health and safety issue. Where concerns arise, the school will consider the HSE Management Standards areas of demands, control, support, relationships, role and change, alongside individual circumstances and reasonable adjustments. Concerns may be considered through an individual or team risk assessment where appropriate.

17. Smoking and vaping

Smoking and vaping are not permitted on ReFocus premises except where an explicitly designated arrangement exists in accordance with law and school rules. Pupils must not smoke or vape on school premises or during school activities.

18. Infection prevention and public health

ReFocus follows current UKHSA and DfE guidance when responding to infectious disease and public-health incidents. Advice changes over time; therefore the school will use current national guidance rather than relying on a static list of exclusion periods within this policy.

- Promote effective hand and respiratory hygiene and appropriate cleaning routines.
- Provide and use personal protective equipment where required by risk assessment or public-health guidance.
- Clean blood and body-fluid spillages promptly using appropriate products and procedures.
- Maintain suitable ventilation and assess areas where ventilation or infection risk requires additional control.
- Follow current UKHSA public-health exclusion advice and contact the local Health Protection Team where advised.
- Consider additional measures for pupils or staff who are particularly vulnerable to infection, seeking medical or public-health advice where appropriate.

For COVID-19 and other respiratory infections, ReFocus will follow current UKHSA advice, including advice about staying away from the setting where symptoms are more than mild, rather than applying historic fixed isolation periods.

19. New and expectant mothers

Where ReFocus is notified, or it is otherwise known, that an employee is pregnant, has given birth within the previous six months or is breastfeeding, an individual risk assessment will be completed and reviewed as circumstances change. Controls will consider relevant infection, manual handling, work pattern, stress, chemical, physical and other workplace risks. Appropriate adjustments will be made where required.

20. Accident, incident and near-miss reporting / RIDDOR

Accidents, significant incidents and near misses will be reported promptly and recorded using the school's agreed system. The immediate response will prioritise first aid, safeguarding, emergency action and making the area safe.

- Reports will contain sufficient factual detail to understand what happened, who was affected and what action was taken.
- Significant events will be reviewed to identify immediate and underlying causes and whether risk assessments or controls need updating.
- Records will be retained in accordance with the school's retention schedule, taking account of safeguarding, employment, insurance, limitation and specialist requirements. A single fixed retention period will not be applied to every record.
- The Health and Safety Lead will ensure that reportable work-related injuries, diseases and dangerous occurrences are notified to HSE under RIDDOR within the applicable timescale.

An injury to a pupil, visitor or other person who is not at work is not reportable merely because the person attends hospital. RIDDOR applies where the relevant legal criteria are met, including the required connection with a work activity. Current HSE guidance will be used when deciding whether and how to report.

21. Training and competence

Health and safety information and training will form part of staff induction and ongoing professional development. The level of training will reflect the individual's role and the risks involved.

- Staff will receive information about emergency procedures, reporting arrangements and relevant risk controls.
- Staff working with higher-risk equipment, substances, activities or pupils will receive additional role-specific training or instruction.
- Competence may include suitable knowledge, training, experience and authority; specialist advice will be obtained where internal competence is insufficient.
- Training and competence records will be maintained where appropriate.

22. Monitoring, audit and review

The Health and Safety Lead and Headteacher will monitor implementation through appropriate checks, records, incident review, risk-assessment tracking and follow-up of actions. Significant concerns or overdue actions will be escalated.

- The Headteacher will review implementation at least annually and following significant incidents or operational change.
- The proprietor will review and approve this policy annually and following significant legal or operational change.
- The policy will normally be reviewed by September 2027, or sooner where required.

23. Related policies and guidance

This policy should be read alongside relevant ReFocus policies and procedures, including:

- Risk Assessment Policy;
- First Aid Policy;
- Child Protection and Safeguarding Policy;
- Behaviour Policy and restrictive-intervention procedures;
- Supporting Pupils with Medical Conditions Policy and Allergy Safety Policy;
- Accessibility Plan and SEND Policy;
- Educational Visits procedures;
- Data Protection and Records Retention arrangements;
- Staff Code of Conduct, Lone Working and Critical Incident procedures; and
- Premises Management Policy.

External guidance includes current DfE health and safety advice for schools, HSE guidance on risk management, asbestos, legionella and RIDDOR, UKHSA public-health exclusion guidance, and government guidance on Martyn's Law for education settings.

Appendix A. Fire safety checklist – Knox Road

Issue to check	Yes / No / N/A
Are fire and emergency instructions prominently displayed and current?	
Is fire-fighting equipment in place, accessible and within service date?	
Is equipment clearly identified for the type of fire for which it is intended?	
Are fire exits and escape routes clearly signed and unobstructed?	
Are fire doors operating correctly and not improperly wedged open?	
Are flammable materials stored appropriately and away from ignition sources?	
Do staff and pupils understand the current evacuation arrangements?	
Can the alarm be heard in all relevant areas?	
Are arrangements in place for anyone requiring assistance to evacuate?	
Have identified fire-risk-assessment actions been completed or appropriately managed?	

Appendix B. Fire safety checklist – Rose Cottage

Issue to check	Yes / No / N/A
Are fire and emergency instructions prominently displayed and current?	
Is fire-fighting equipment in place, accessible and within service date?	
Is equipment clearly identified for the type of fire for which it is intended?	
Are fire exits and escape routes clearly signed and unobstructed?	
Are fire doors operating correctly and not improperly wedged open?	
Are flammable materials stored appropriately and away from ignition sources?	
Do staff and pupils understand the current evacuation arrangements?	
Can the alarm be heard in all relevant areas?	
Are arrangements in place for anyone requiring assistance to evacuate?	
Have identified fire-risk-assessment actions been completed or appropriately managed?	

Appendix C. Accident / incident / near-miss report

Name of person affected	
Role / class / visitor status	
Date and time	
Location	
Type	☐ Accident ☐ Incident ☐ Near miss ☐ Other
Incident details	Describe what happened, how it happened and any injury or harm.
Immediate action	First aid, safeguarding action, emergency response, isolation of area/equipment or other immediate controls.
Follow-up required	Actions to reduce recurrence, review risk assessment, maintenance, training, communication or referral.
RIDDOR considered?	☐ No ☐ Yes Outcome / reference: _____
Reported by	
Signature / date	
Reviewed by / date	