



**ANSFORD ACADEMY**  
LEARNING TOGETHER TO LEAD OUR LIVES

# **Business and Finance Policy Suite Health and Safety Policy**

**Incorporating: Risk Assessment Policy, Premises Management Policy, Use of CCTV Policy**

<b>Status:</b>	<b>Statutory</b>
<b>Adopted:</b>	<b>May 2023</b>
<b>Renewal Period:</b>	<b>Yearly</b>
<b>Next Review:</b>	<b>May 2024</b>

## 1. Aims

The policy exists to ensure that adequate arrangements are in place to secure, as far as is reasonably practicable, the health, safety and welfare of students, staff and others using or visiting the premises or participating in school activities.

The Academy recognises and accepts that every one of its employees, students and visitors to the Academy is entitled to a safe and healthy environment.

The Academy recognises its responsibilities to raise awareness amongst students, staff and other site users of health and safety issues and to encourage good practice.

It is the intention of the governing body of the Academy that all appropriate steps will be taken to meet statutory requirements, recognised codes of practice and guidance notes in establishing a safe and healthy environment.

## 2. Legislation

This policy is based on advice from the Department for Education on health and safety in schools and the following legislation:

- The Health and Safety at Work etc. Act 1974, which sets out the general duties employers have towards employees and duties relating to lettings.
- The Management of Health and Safety at Work Regulations 1992, which require employers to make an assessment of the risks to the health and safety of their employees.
- The Management of Health and Safety at Work Regulations 1999, which require employers to carry out risk assessments, make arrangements to implement necessary measures, and arrange for appropriate information and training.
- The Control of Substances Hazardous to Health Regulations 2002, which require employers to control substances that are hazardous to health.
- The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) 2013, which state that some accidents must be reported to the Health and Safety Executive and set out the timeframe for this and how long records of such accidents must be kept.
- The Health and Safety (Display Screen Equipment) Regulations 1992, which require employers to carry out digital screen equipment assessments and states users' entitlement to an eyesight test.
- The Gas Safety (Installation and Use) Regulations 1998, which require work on gas fittings to be carried out by someone on the Gas Safe Register.
- The Regulatory Reform (Fire Safety) Order 2005, which requires employers to take general fire precautions to ensure the safety of their staff.
- The Work at Height Regulations 2005, which requires employers to protect their staff from falls from height.
- The school follows national guidance published by Public Health England when responding to infection control issues.

## 3. Roles and responsibilities

All employees have both a duty and a responsibility to take reasonable care to avoid injury to themselves and others and to co-operate to ensure statutory duties and obligations are fulfilled. The Academy's Health and Safety Policy can only be successfully implemented with the full co-operation of everyone concerned.

a. The Governing Body:

- Has ultimate responsibility for health and safety matters, but will delegate day-to-day responsibility to the Headteacher;
- Has a duty to take reasonable steps to ensure that staff and students are not exposed to risks to their health and safety. This applies to activities on or off the school premises.
- As the employer, also has a duty to:
  - Assess the risks to staff and others affected by school activities in order to identify and introduce the health and safety measures necessary to manage those risks.
  - Inform employees about risks and the measures in place to manage them.
  - Ensure that adequate health and safety training is provided.

b. The Headteacher, on behalf of the governing body, oversees health and safety. This involves:

- Implementing the Health and Safety Policy.
- Ensuring there is enough staff to safely supervise students.
- Ensuring that the school building and premises are safe and regularly inspected.
- Providing adequate training for school staff.
- Reporting to the governing body on health and safety matters.
- Ensuring appropriate evacuation procedures are in place and regular fire drills are held.
- Ensuring that in their absence, health and safety responsibilities are delegated to another member of staff.
- Ensuring all risk assessments are completed and reviewed.
- Monitoring cleaning contracts, and ensuring cleaners are appropriately trained and have access to personal protective equipment, where necessary.

The Headteacher delegates the day to day operations in this respect to the Business Manager.

c. The Health and Safety Lead

The Business Manager is also the Health and Safety Coordinator and has responsibility for the day to day implementation of the general Academy Health and Safety Policy and will be the designated contact with the Health and Safety Executive. The Business Manager will:

- Ensure that responsibility for aspects of Health and Safety are written into the job descriptions of the Academy's managers and staff.
- Organise and implement regular inspections and audit from a trained external provider.
- Promote staff attendance on appropriate health and safety courses.
- Monitor the effectiveness of Risk Assessments throughout the Academy, especially in relation to trips.
- Ensure there are procedures in place to monitor and assess outside contractors before the commencement of any work within the Academy boundaries.
- Make sure that risk assessments are completed, logged and effectively monitored. Reviews are conducted when there is any change to equipment or resources, any change to the Academy premises, or when particular needs of a student or other visitor necessitate this.

d. Staff

- Take reasonable care of their own health and safety and that of others who may be affected by what they do at work.
- Co-operate with the school on health and safety matters.
- Work in accordance with training and instructions.
- Inform the appropriate person of any work situation representing a serious and immediate danger so that remedial action can be taken.
- Model safe and hygienic practice for students.
- Understand emergency evacuation procedures and feel confident in implementing them.
- All staff are responsible for carrying out a Risk Assessment according to their roles and responsibilities.

e. Departmental Roles

The Site Manager and Compliance Caretaker are responsible for the day to application of health and safety procedures and risk assessment relating to the safe use of the premises and vehicles including statutory and other inspections and remedial actions.

The Heads of Science, DT and PE - are responsible for establishing subject specific Health and Safety Policies. The Head of each department is responsible for the policy, risk assessment and its day to day implementation.

f. Responsibilities of Supervisory Staff

All supervisory staff will make themselves familiar with the requirements of health and safety legislation and codes of practice that are relevant to the work of their area of responsibility.

In addition to the general duties that all members of staff have, they will be directly responsible to the Health and Safety Coordinator for the implementation and operation of the Academy's Health and Safety Policy within their relevant departments and areas of responsibility.

Supervisory staff will take a direct interest in the Academy's Health and Safety Policy and in ensuring that staff, students and others comply with its requirements.

Supervisory staff will be responsible for ensuring the adequacy of suitably trained staff within their area of control. This will include liaison with the Health and Safety Coordinator in connection with the training of staff.

g. Students and Parents

Are responsible for following the school's health and safety advice, on-site and off-site, and for reporting any health and safety incidents to a member of staff.

h. Contractors

Will agree health and safety practices with the Site Manager before starting work.

#### **4. Specific Areas of Health and Safety**

##### **a) Emergencies**

Emergencies on site will be dealt with through 999 procedures. The Academy has set procedures for the handling of critical incidences. The procedures are set out in the Critical Incident Plan and Emergency File held by the Business Manager.

##### **b) Site Security**

All visitors to the Academy must sign in at the reception. Visitors will be collected from reception by the member of staff concerned or escorted to the appropriate area of the Academy. Whilst on site, all visitors and contractors must wear an Academy visitor's badge.

Hirers of the Academy premises must use plant, equipment and substances correctly and use the appropriate safety equipment. They will be made aware of their obligations in relation to Health and Safety when making the booking.

The Site Manager is responsible for the security of the school site in and out of school hours and there are procedures in place for response by the Caretaking Team and Security Contractor. The Site Manager and Compliance Caretaker are responsible for visual inspections of the site, and for ensuring the maintenance of the intruder and fire alarm systems.

The Academy operates a CCTV system. Please refer to Appendix B.

##### **c) Contractors**

No contractor may undertake work on the Academy site without permission from the Site Manager other than in an emergency, e.g. fire, flooding or to make safe following theft/vandalism. Contractors are responsible for the Health and Safety of their employees and for their safe working practices, which must not constitute a hazard to staff, students and visitors to the Academy.

##### **d) Fire**

Emergency exits, assembly points and assembly point instructions are clearly identified by safety signs and notices. Fire risk assessment of the premises will be reviewed regularly by a specialist contractor.

Emergency evacuations are practiced during the academic year. The fire alarm is a loud ringing bell. Fire alarm testing will take place weekly. New staff will be trained in fire safety and all staff and students are made aware of any new fire risks.

In the event of a fire:

- The alarm will be raised immediately by whoever discovers the fire and emergency services contacted. Evacuation procedures will also begin immediately
- Fire extinguishers may be used by staff only, and only then if staff are trained in how to operate them and are confident they can use them without putting themselves or others at risk
- Staff and students congregate at the assembly points on the tennis courts.
- Tutors take a register of students and a staff list is taken.
- Staff and students will remain outside the building until the emergency services say it is safe to re-enter

The school will have special arrangements in place for the evacuation of people with mobility needs and fire risk assessments will also pay particular attention to those with disabilities.

#### **e) Control of substances hazardous to health (COSHH)**

Schools are required to control hazardous substances, which can take many forms, including:

- Chemicals
- Products containing chemicals
- Fumes
- Dusts
- Vapours
- Mists
- Gases and asphyxiating gases
- Germs that cause diseases, such as leptospirosis or legionnaires disease.

Control of substances hazardous to health (COSHH) risk assessments are completed within the using department and circulated to staff. Staff will be provided with protective equipment, where necessary. Hazardous products will be stored in accordance with instructions on the product label. All hazardous products are kept in their original containers, with clear labelling and product information. Any hazardous products are disposed of in accordance with specific disposal procedures. Emergency procedures, including procedures for dealing with spillages, are displayed near where hazardous products are stored and in areas where they are routinely used.

#### **f) Gas Safety**

Installation, maintenance and repair of gas appliances and fittings will be carried out by a registered engineer. Gas pipework, appliances and flues are regularly maintained. All rooms with gas appliances are checked to ensure that they have adequate ventilation.

#### **g) Legionella**

An annual legionella risk assessment is maintained by the school. The site team are responsible for ensuring that the identified operational controls are conducted and recorded.

#### **h) Asbestos**

The Academy maintains an asbestos management plan and register. Staff will be briefed, where relevant, on the hazards of asbestos, the location of any asbestos in the school and the action to take if they suspect they have disturbed it. Contractors will work in accordance with a permit system.

#### **i) Electrical Equipment**

All staff are responsible for ensuring that they use and handle electrical equipment sensibly and safely. Any student or volunteer who handles electrical appliances should do so under the supervision of the member of staff. Any potential hazards should be reported to the Site Manager. The Academy follows a cycle of carrying out portable appliance testing (PAT). Maintenance, repair, installation and disconnection work associated with permanently installed or portable electrical equipment is only carried out by a competent person.

#### **j) PE Equipment**

PE staff are trained to set up and use PE equipment in the correct fashion. Regular servicing of equipment takes place by a specialist contractor. The PE department has a supplementary health and safety policy which consider the controls required to minimise injury from sport.

#### **k) Display Screen Equipment**

Where a member of staff uses computers daily as a significant part of their normal work, a display screen equipment (DSE) assessment will be carried out. 'Significant' is taken to be continuous/near continuous spells of an hour or more at a time.

### **l) Safety Equipment and Clothing**

Protective clothing/gloves/masks/helmets will be provided for use by technicians and site supervisory staff when required. Staff and students must be provided with and use protective glasses/eye shields in all workshops and laboratories. Visitors must be provided with protective clothing as appropriate.

When new equipment is purchased, it is the responsibility of the departmental manager, with the assistance of the Health and Safety Coordinator as necessary, to ensure that it meets appropriate educational standards and that its installation and use conforms to Health and Safety requirements.

### **m) Lone Working**

The Academy recognises that some staff may, at times, be lone working. The reasons for this would include:

- Late working
- Home or site visits
- Weekend working
- Site manager duties
- Site cleaning duties
- Working in a single occupancy office

In roles where lone working is expected to be a frequent occurrence, a job specific risk assessment will be carried out with the member of staff. This will assess the types of function the person can do during periods of lone working and those which are prohibited. Procedures will also be agreed for accessing medical assistance. In cases where staff are making home visits, arrangements should be agreed in advance for a colleague to know their location and that they have returned to home. The lone worker will also be asked to ensure that they are medically fit to work alone.

### **n) Working at Height**

Operating procedures and risk assessments exist for working at height. Site staff will receive appropriate training on the use of ladders and the scaffolding tower. In addition:

- The site team retains ladders that are checked and are suitable for working at height.
- Students are prohibited from using ladders.
- Contractors are expected to provide their own ladders for working at height.
- Before using a ladder, staff are expected to conduct a visual inspection to ensure its safety.
- Access to high levels, such as roofs, is only permitted by trained persons.

### **o) Manual Handling**

It is up to individuals to determine whether they are fit to lift or move equipment and furniture. If an individual feels that to lift an item could result in injury or exacerbate an existing condition, they must ask for assistance. The school will ensure that proper mechanical aids and lifting equipment are available for use by trained staff.

Staff and students are expected to use the following basic manual handling procedure:

- Plan the lift and assess the load. If it is awkward or heavy, use a mechanical aid, such as a trolley, or ask another person to help.
- Take the more direct route that is clear from obstruction and is as flat as possible
- Ensure the area where you plan to offload the load is clear

- When lifting, bend your knees and keep your back straight, feet apart and angled out. Ensure the load is held close to the body and firmly. Lift smoothly and slowly and avoid twisting, stretching and reaching where practicable.

#### **p) Off-site Visits**

The Academy has set procedures for external trips. Central to the process is the assessment and mitigation of risks. The Academy utilises the European Education Consultants online system and consults with the Outdoor Education Service.

The procedures for off site visits is set out in the staff handbook. In summary, it is required that staff follow the set procedures which will ensure that:

- Risk assessments will be completed where off-site visits and activities require them.
- All off-site visits are appropriately staffed.
- The correct equipment is taken such as first aid kits.

#### **q) Driving the School Vehicles and Transporting Students**

The Academy will follow the following standards:

Driving licences held before 1 January 1997 give entitlement to drive a minibus provided it has a maximum of 17 seats including the driver's seat and is not being used for hire or reward. Staff will be asked to participate in driver training (MiDAS or similar) prior to transporting students, unless they have significant prior experience. Refresher training will be provided.

Post 1 January 1997 drivers have no entitlement to drive a minibus and must pass a D1 test. The D1 minibus test is conducted by the Driving Standards Agency (DSA) and you will have to complete a theory and practical test. Training will cover all aspects of general driving and all the required manoeuvres. Courses are usually a minimum of 2 days with minimum length being assessed by the DSA instructor.

Where staff use their own vehicles to transport students, they will need to complete a risk assessment in conjunction with the Health and Safety Coordinator. This will consider the safety record of the driver and their experience. Parental permission to transport a student must be in place.

#### **r) Violence at Work**

We believe that staff should not be in any danger at work, and will not tolerate violent or threatening behaviour towards our staff. All staff will report any incidents of aggression or violence (or near misses) directed to themselves to their line manager immediately. This applies to violence from students, visitors or other staff.

#### **s) Infection Prevention and Control**

We follow national guidance published by the UK Health Security Agency when responding to infection control issues. We will encourage staff and students to follow this good hygiene practices as advised by the Agency covering handwashing, coughing and sneezing, personal protective equipment, cleaning, laundry and clinical waste.

Infectious disease management

We will ensure adequate risk reduction measures are in place to manage the spread of acute respiratory diseases, including COVID-19, and carry out appropriate risk assessments, reviewing them regularly and monitoring whether any measures in place are working effectively.



**t) Students Vulnerable to Infection**

Some medical conditions make students vulnerable to infections that would rarely be serious in most children. The Academy will normally have been made aware of such vulnerable children. These children are particularly vulnerable to chickenpox, measles or slapped cheek disease (parvovirus B19) and, if exposed to any of these, the parent/carer will be informed promptly.

**u) Exclusion Periods for Infectious Diseases**

The school will follow recommended exclusion periods outlined by the UK Health Security Agency and other government guidance. In the event of an epidemic/pandemic, we will follow advice from the UK Health Security Agency about the appropriate course of action.

**v) Animals**

The Academy has animals on site and risk assessments have been carried out which consider health and safety aspects. Guidance is given on hand washing, animal waste and infection control.

**w) New and Expectant Mothers**

Risk assessments will be carried out whenever any employee or student notifies the school that they are pregnant. Appropriate measures will be put in place to control risks identified.

**x) Occupational Stress and Wellbeing**

Ansford Academy recognises the risks of workplace stress and the effect of external non-work stresses on staff. Access is available to staff to an employee assistance scheme offering practical support and counselling services. The Academy will also use referrals to occupational health services to help inform the process of recovery and consideration of the employees future within the profession or organisation for their own wellbeing.

**y) Staff: Vaping, Smoking, Drugs, Substance and Alcohol Misuse**

Smoking and Vaping are not permitted anywhere on the school premises.

Substance use problems are defined as those problems which incorporate a variety of harms (including physical and mental) caused by alcohol or other drugs which may be problematic to the individual or the organisation. The Academy recognises that substance misuse is associated with poor mental health, a variety of negative workplace outcomes, including higher levels of absenteeism, reduced performance and increased frequency of accidents and lapses in judgment.

The Academy will respond where consumption of alcohol or other substance misuse is suspected due to the duty of care it holds for staff. The actions will include seeking advice from professional support organisations, HR advisors and occupational health. Where a clear detrimental effect on an individual's attendance or work performance is evident, additional measures through capability and/or disciplinary procedures may be required. Concerns about colleagues can be raised through the Business Manager, DSL or Headteacher.

**z) Accident Record**

When minor first aid is sought a record of the incident and treatment will be recorded. For other accidents or near misses a report will be passed to the Business Manager for assessment. A record of any accident which results in a reportable injury, disease, or dangerous occurrence as defined in the RIDDOR 2013 legislation (regulations 4, 5, 6 and 7 will be kept). The Business Manager will report these to the Health and Safety Executive.

## **Risk Assessment Policy and Procedures**

The Academy recognises the legal duties it has in assessing risks. Risk management is the consideration of the risks that arise in the workplace and then putting in place sensible health and safety measures to control them. In accordance with the duties under the Management of Health and Safety at Work Regulations 2000, the Academy is required to undertake regular risk assessments and take any necessary action arising from these according to provisions set out in the Health and Safety policy and elsewhere.

The Purpose of a Risk Assessment is to identify hazards and evaluate any associated risks. As required by statute the Academy has risk assessment processes covering:

- Workers under the age of 18
- Asbestos
- Substances hazardous to health
- Display screen equipment
- Fire
- First aid
- Manual handling
- Working at height
- Children being drawn into terrorism
- COVID-19

There are a suite of risk assessments covering school trips, site and buildings activities, science, DT, PE and other aspects of school life and safe occupation of the Academy.

The Academy uses recognised systems for the identification and assessment of risk. This includes the EEC European Safety Suite and CLEAPPS. On occasions, bespoke risk assessments will be developed using the methodology recommended by the HSE:

Step 1: Identify the hazards

Step 2: Decide who might be harmed and how

Step 3: Evaluate the risks and decide on precautions

Step 4: Record your findings and implement them

Step 5: Review your assessment and update if necessary

It is the Academy Policy to promote the use of written risk assessment as well as developing staff skills for dynamic risk assessment in relation to school trips.

### **Monitoring and Training**

This policy will be reviewed by the Business Manager annually.

Our staff are provided with health and safety training as part of their induction process and on an ongoing basis. Staff who work in high risk environments, site management, science, DT and PE are given additional health and safety training.

## Appendix A: Premises Management Documents

The Academy is required to maintain premises management documents that demonstrate how it:

- Manages its buildings and equipment in an efficient, legally compliant way
- Inspects and tests buildings and equipment regularly, taking into account statutory requirements and best practice recommendations
- Promotes the safety and wellbeing of our staff, students, parents and visitors through effective maintenance of buildings and equipment in accordance with the Health and Safety at Work etc. Act 1974
- Complies with the requirements of The Education (Independent School Standards) Regulations 2014

### Roles and Responsibilities

The Governors will ensure that the premises management requirements are properly implemented and that sufficient resources in place to ensure that tests and inspections can be carried out.

The Headteacher, through delegation to the Business Manager, is responsible for ensuring relevant risk assessments are conducted and for reporting to the governing body.

The Site Manager and Compliance Technician are responsible for:

- Inspecting and maintaining the school premises
- Conducting repairs and maintenance
- Being the first point of contact for any issues with the premises
- Conducting and keeping a record of risk assessments and incident logs related to the school premises
- Liaising with the Business Manager about what actions need to be taken to keep the school premises safe

### Inspection and Testing

The Academy seeks to maintain accurate records and details of all statutory tests which are undertaken at our premises. This includes relevant paperwork and certificates.

Requirements and recommendations highlighted in inspection reports and certificates are reviewed and acted on as necessary and subject to budget availability and risk assessment.

The table below sets out the issues we inspect, the inspection frequency, and the person responsible for checking each issue and, where appropriate, engaging a suitably qualified person to carry out inspection, testing or maintenance. It covers statutory checks as well as recommended good practice checks from relevant guidance. It is based on the Department for Education's guidance on good estate management for schools.

ISSUE TO INSPECT	FREQUENCY	PERSON RESPONSIBLE
Portable appliance testing (PAT)	<p>Variable, according to risk and how the equipment is constructed.</p> <p>Regular visual inspections where PAT is not required.</p> <p>We will refer to <a href="#">HSE guidance</a> on maintaining portable electric equipment for suggested intervals and types of testing/inspection.</p>	Site Team Member holding appropriate training qualification
Fixed electrical installation tests (including lightning conductors)	<p>Variable, according to the number and severity of faults found at last inspection.</p> <p>Inspection and testing always carried out by a competent person.</p>	Electrical Contractor
Emergency lighting	<p>Monthly flash test.</p> <p>6-monthly condition test (including 3-hour battery test) by a competent person.</p>	Site Team Member holding appropriate training qualification
Gas appliances and fittings	<p>Routinely, in accordance with manufacturer recommendations (or other professional advice if unavailable).</p> <p>Annual safety checks (in line with good practice / required if the premises are used for residential accommodation).</p> <p>All work carried out by a Gas Safe Registered engineer.</p>	Gas safe contractors and independent pressure vessel inspector
Air conditioning systems	<p>Inspections by an energy assessor at regular intervals (not exceeding 5 years).</p> <p>Annual certificated inspection to ensure no refrigerant leakage.</p> <p>Bi-annual checks and an annual maintenance schedule (in line with good practice).</p>	Air conditioning contractor

ISSUE TO INSPECT	FREQUENCY	PERSON RESPONSIBLE
Pressure systems	No fixed maintenance requirement (our programme takes account of the list on page 44 of the <u>HSE's Safety of Pressure Systems guidance</u> , and an examination of the system is carried out by a competent person by the date set at the previous examination – see pages 35 to 37 of the HSE guidance).	Independent pressure vessel inspector
Legionella checks on all water systems	Risk assessment of each site carried out and reviewed regularly by a competent person. The frequency of monitoring checks varies for evaporative cooling systems, hot and cold water systems and other risk systems – specific details can be found in <u>guidance for each type from the HSE</u> .	Site Team Member holding appropriate training qualification and independent inspection.
Asbestos	Regular inspections as part of the asbestos register and management plan.  Reviews of the asbestos register annually.  Refurbishment and demolition surveys before any refurbishment or demolition work.	Site Team Member holding appropriate training qualification.  Approved contractors for surveys or removal.
Equipment used for working at height	Inspected before use, and at suitable intervals appropriate to the environment it's used in and how it's used.  In addition, inspections after anything that may affect the safety or stability of equipment, e.g. adverse weather or accidental damage.	Tower – annual inspection and ticketing system by Site Team Member holding appropriate training qualification.
Fire detection and alarm systems	Weekly alarm tests, with a different call point tested each week where applicable.  Quarterly and annual inspections and tests by a competent person.  Annual fire risk assessment by a competent person also includes the maintenance of fire detection and alarm systems.	Site Team Member holding appropriate training qualification plus Rhino Fire

ISSUE TO INSPECT	FREQUENCY	PERSON RESPONSIBLE
Fire doors	Regular checks by a competent person.	Site Team Member holding appropriate training qualification plus Rhino Fire
Firefighting equipment	Most equipment – extinguishers, fire blankets, hose reels, fixed systems (such as sprinkler systems) and fire service facilities (such as dry risers and access for emergency vehicles) – inspected annually (by a competent person where required) unless manufacturers’ guidelines suggest differently.	Site Team Member holding appropriate training qualification plus Rhino Fire
Extraction systems	<p>Regular removal and cleaning of grease filters and cleaning of ductwork for kitchen extraction systems.</p> <p>Local exhaust ventilation systems (such as those for working with hazardous substances) examined and tested at least every 14 months by a competent person.</p> <p>More routine checks also set out in system logbooks.</p>	Specialist Contractor
Chemical storage	<p>Inventories are kept up-to-date.</p> <p>Risk assessments for the Control of Substances Hazardous to Health (COSHH) are reviewed on a regular basis, plus whenever it’s considered that the original assessment may no longer be valid, or where the circumstances of the work change significantly and may affect employees’ exposure to a hazardous substance (in line with <a href="#">HSE guidance on COSHH assessment</a>).</p>	Site Team Member holding appropriate training qualification and Science Technician
Gymnasium equipment	<p>Regular inspections – at least annually, and more regularly where any equipment is used more frequently than normal (e.g. where community use increases how often equipment is used).</p> <p>Outdoor fixed play equipment – periodic and annual inspections by a competent person.</p>	Inspection and remedial works by SportSafe

ISSUE TO INSPECT	FREQUENCY	PERSON RESPONSIBLE
Tree safety	As part of risk assessment responsibilities, periodic visual checks for stability are carried out, with more detailed assessments if suspected structural faults or other risks are found.	Arboriculturist inspection
Radon	<p>Risk assessments including radon measurements will be carried out in all of our above-ground workplaces in radon-affected areas, and all of our below-ground workplaces.</p> <p>Radon measurements will last for 3 months, using radon monitors, in line with <a href="#">Public Health England (now the UK Health Security Agency) radon guidance for schools</a>.</p> <p>Where measurements show radon levels below 300Bq/m<sup>3</sup>, radon levels will be remeasured at least every 10 years. If significant changes are made to the buildings or work processes, remeasurement will also be considered.</p> <p>For any sites with radon levels above 300Bq/m<sup>3</sup> we will work with a radiation protection adviser to manage reduction and decide on risk assessment and remeasurement frequency.</p>	Site Team Member holding appropriate training qualification and readings by approved lab.

## 5. Other checks

The Academy also make sure further checks are made to confirm the following:

- Correct and up-to-date information is displayed in notices
- Compliance with the Construction (Design and Management) Regulations 2015 during construction projects
- Contractors have the necessary qualifications to carry out the specified work
- Compliance with the Equality Act 2010 when making changes or alterations to a building or the external environment

## Appendix B: CCTV Policy

Ansford Academy are committed to ensuring the safety of staff, visitors and students. To that end, we use surveillance cameras to monitor any instances of aggression or physical damage to the Academy and its members. The purpose of this policy is to manage and regulate the use of the surveillance and CCTV systems and to ensure that:

- The Academy complies with the UK GDPR, effective 1<sup>st</sup> January 2021.
- The images that are captured are useable for the purposes required.
- The Academy reassures those persons whose images are being captured, that the images are being handled in accordance with data protection legislation and their rights are being upheld.

This policy covers the use of surveillance and CCTV systems which capture moving and still images of people who could be identified, as well as information relating to individuals for any of the following purposes:

- Observing what an individual is doing
- Taking action to prevent a crime
- Using images of individuals that could affect their privacy

### About this policy

This policy has been created with regard to the Home Office guidance 'The Surveillance Camera Code of Practice' (2013, updated 2021). This policy has due regard to legislation including, but not limited to, the following:

- The UK General Data Protection Regulation
- The Data Protection Act 2018
- The Freedom of Information Act 2000
- The Protection of Freedoms Act 2012
- The Regulation of Investigatory Powers Act 2000

### Definition of Data Protection Terms

For the purpose of this policy a set of definitions will be outlined, in accordance with the Surveillance Camera Code of Practice:

CCTV	Closed Circuit Television is a system of cameras which stream an image to a central monitor, where activity can be recorded
Surveillance	Monitoring the movements and behaviour of individuals; through CCTV or BWC
Overt Surveillance	Any use of surveillance for which authority does not fall under the Regulation of Investigatory Powers Act 2000.
Covert Surveillance	Any use of surveillance which is intentionally not shared with the subjects it is recording. Subjects will not be informed of such surveillance. Ansford Academy does not condone the use of covert surveillance when monitoring staff, students and/or volunteers. Covert surveillance will only be operable in extreme circumstances.



## **The Data Protection Principles and Privacy by Design**

Data collected from surveillance and CCTV will be:

- Processed lawfully, fairly and in a transparent manner in relation to individuals;
- Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
- Adequate, relevant, and limited to what is necessary in relation to the purposes for which they are processed;
- Accurate and, where necessary, kept up to date;
- Kept for no longer than is necessary for the purposes for which the personal data are processed;
- Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage.

Ansford Academy will follow the ICO's guidelines on Privacy by Design before planning installing and using a surveillance system and will:

- Consider whether it can fulfil its requirements through a less privacy-intrusive system that does not include surveillance and recording.
- Carry out a Data Privacy Impact Assessment (DPIA) to assess security risks and how the rights of individuals will be upheld.
- Where Ansford Academy identifies a high risk to an individual's interests, and it cannot be overcome, the Academy will consult the ICO before they use CCTV, and will act on the ICO's advice.

## **Responsibilities of the Academy**

The Academy, as the corporate body, is the data controller. The governing board of therefore has overall responsibility for ensuring that records are maintained, including security and access arrangements in accordance with regulations.

The role of the data controller includes:

- Processing surveillance and CCTV footage legally and fairly
- Collecting surveillance and CCTV footage for legitimate reasons and ensuring that it is used accordingly.
- Collecting surveillance and CCTV footage that is relevant, adequate and not excessive in relation to the reason for its collection.
- Ensuring that any surveillance and CCTV footage identifying an individual is not kept for longer than is necessary.
- Protecting footage containing personal data against accidental, unlawful destruction, alteration, and disclosure.

## **Responsibilities of the Data Protection Officer**

Ansford Academy are data controllers in law and are required to appoint a Data Protection Officer. Our DPO is Amy Brittan and can be contacted at [dposchools@somerset.gov.uk](mailto:dposchools@somerset.gov.uk) The DPO is responsible for ensuring compliance with current Data Protection legislation and with this policy.

Their responsibilities are laid out in the Data Protection policy, but in relation to CCTV and surveillance they include:

- Ensuring that all data controllers at the Academy handle and process surveillance and CCTV footage in accordance with the 6 data protection principles.
- Ensuring that surveillance and CCTV footage is obtained in line with legal requirements.

- Supporting the Academy to complete a Data Privacy Impact Assessment when installing or replacing cameras (see paragraph 4.2).
- Reviewing the effectiveness of the current CCTV system and making recommendations if appropriate.
- Ensuring that surveillance and CCTV footage is destroyed in line with legal requirements when it falls outside of its retention period.
- Informing data subjects of how their data captured in surveillance and CCTV footage will be used by the Academy; their rights for the data to be destroyed and the measures implemented by the Academy to protect individuals' personal information.

### **Responsibilities of the Headteacher**

The Headteacher has the following responsibilities:

- Delegating to the Business Manager to consult with the DPO to decide where CCTV is needed to justify its means.
- Delegating to the Business Manager to liaise with the DPO regarding the lawful processing of the surveillance and CCTV footage.
- Reviewing the Surveillance and CCTV Policy to ensure it is compliant with current legislation.
- Monitoring legislation to ensure the Academy is using surveillance fairly and lawfully.
- Communicating any changes to legislation to all members of staff.

### **Purpose and Justification**

- The Academy will only use surveillance cameras for the safety and security of its staff, students and visitors.
- Surveillance will be used as a deterrent for violent behaviour and damage to the Academy.
- The Academy may share surveillance footage to assist the police in identifying persons who have committed an offence
- The Academy will only conduct surveillance as a deterrent and will not site cameras in classrooms or any changing facility.  
The Academy may use surveillance data as part of disciplinary and grievance processes. This will be communicated to students and staff through the Academy Privacy Notices.
- If the surveillance and CCTV systems fulfil their purpose and are no longer required the Academy will deactivate them.

### **How the Academy Manages CCTV and Surveillance**

The Academy is registered as a data controller with the Information Commissioner's Office, which also covers the use of surveillance systems.

CCTV warning signs are clearly and prominently placed at all external entrances to the Academy, including gates if coverage includes outdoor areas. The signs contain details of the purpose for using CCTV e.g. public safety or crime prevention.

In areas where CCTV is used, the Academy ensure that there are prominent signs placed at both the entrance of the CCTV zone and within the controlled area.

The surveillance system is a closed digital system will not record audio by default, as audio recording may be considered an excessive intrusion of privacy. If audio recording is possible, this option will be turned off.

The surveillance system has been designed for maximum effectiveness and efficiency; however, the Academy cannot guarantee that every incident will be detected or covered and 'blind spots' may exist.

The surveillance system will not be trained on individuals unless an immediate response to an incident is required.

The surveillance system will not be trained on private vehicles or property outside the perimeter of the Academy.

## **Security**

Access to the surveillance system, software and data is strictly limited to authorised school staff and is password protected.

The Academy 's authorised CCTV system users are:

- Headteacher
- Assistant Headteacher: Community and Conduct
- Business Manager
- Site Manager and Compliance Caretaker

Surveillance and CCTV systems will be tested for security flaws once a term to ensure that they are being properly maintained at all times.

The Headteacher and authorised staff will decide when to record footage, e.g. a continuous loop outside the grounds to deter intruders. Any unnecessary footage captured will be securely deleted from the system. Any cameras that present faults will be repaired immediately to avoid any risk of a data breach.

## **Covert Monitoring**

The Academy may in exceptional circumstances set up covert monitoring. For example:

- Where there is good cause to suspect that an illegal or unauthorised action(s), is taking place, or where there are grounds to suspect serious misconduct;
- Where notifying the individuals about the monitoring would seriously prejudice the reason for making the recording.

In these circumstances, authorisation must be obtained from the Headteacher. Covert monitoring must cease following completion of an investigation. Cameras sited for the purpose of covert monitoring will not be used in areas which are reasonably expected to be private, for example toilets. The Human Rights and Employment Rights of all the people who use the Academy must be respected and covert monitoring must only be used as a last resort.

## **Storage and Retention of Images**

Recorded data will not be retained for longer than is necessary. While retained, the integrity of the recordings will be maintained to ensure their evidential value and to protect the rights of the people whose images have been recorded. The CCTV images will be kept for 90 days (in line with the purpose for recording this data) unless there is a current incident that is being investigated.

All retained data will be stored securely and will be listed on the Academy's Data Asset Audit. All retained data must be stored in a searchable system. Only a primary copy should be kept, and secondary copies should only be created in exceptional circumstances.

## **Subject Access Requests (SARs)**

Individuals have the right to request access to video footage relating to themselves under the Data Protection Act 2018. All requests should be made to the Headteacher or the Data Protection Officer.

Individuals submitting requests for access will be asked to provide sufficient information to enable the footage relating to them to be identified, for example, date, time and location. Requests may be written or verbal. The Academy will immediately indicate receipt and then respond within one calendar month of receiving the request.

The Academy reserves the right to refuse access to video footage where this would prejudice the legal rights of other individuals or jeopardise an ongoing investigation. All attempts will be made to allow the viewing of the video. If others can be identified, the Academy will assess the risk to others from the video being viewed by the requester. If there is likely to be a risk of harm, the Academy may consider the following options where appropriate:

- Obtain the consent of others to share the video with the requester;
- Use video-editing software to blur the faces of others who can be identified from the video;
- Provide selected still images from the video and blur the identifiable faces;
- Provide a transcript or written description of the contents of the video.

If all options have been considered and the Academy still consider there to be a risk to others from the requester viewing the video, the Academy may decline the request to view the video (although relevant exemptions in the Data Protection Act 2018 will need to be identified by the Academy provided to the requester). The Academy should not provide copies of the video to others unless instructed to do so in law or there is no risk to individuals who may be identifiable from the video.

#### **Access to and Disclosure to Other Third Parties**

There will be no disclosure of recorded data to third parties other than to authorised personnel such as the Police and service providers to the Academy where these would reasonably need access to the data (e.g. investigators) and with the correct authorisation. Requests from third parties should be made in writing to the Headteacher or the Data Protection Officer. Consideration should always be given to the safeguarding and best interest of students. Data Protection should not be used as an excuse to prevent the viewing of images if there is an overwhelming need. All disclosures and the reasons for release should be recorded.

The data may be used within the Academy's discipline and grievance procedures as required and will be subject to the usual confidentiality requirements of those procedures. This will be communicated to staff through the Academy Privacy Notices.

#### **Complaints**

Complaints and enquiries about the operation of CCTV within the Academy should be directed to the Headteacher or the Data Protection Officer in the first instance.