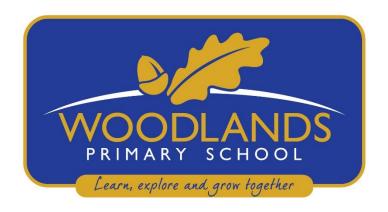
## **Woodlands Primary School**

## Health and Safety Policy



Written by	Claire Gillick
Ratified by Governors	March 2024
Date for Review	March 2025
Signed – Chair of Governors	
Signed – Headteacher	
Is this an internal or external policy?	Internal
Is this based on a model policy?	KCC model Policy

This policy has been impact assessed by Claire Gillick in order to ensure that it does not have an adverse effect on race, gender or disability equality.

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#### Section A – Introduction:

#### A1 - A note to the Headteacher:

Before you devise your school health and safety policy, please read the following information:

- 1. The headteacher must keep the policy up to date to show how health and safety is managed within the school environment.
- **2.** The employer (the local authority, governing body, or proprietor) is responsible for health and safety, though tasks may be delegated, the responsibility cannot.
- **3**. You should consult with staff and governors when devising the policy and ensure that all staff have an opportunity to contribute, and so staff have an understanding of what it means for them.
- **4**. Some schools prefer to devise a short policy and cross reference to other documents held in school.
- **5**. The policy must be signed and dated by the headteacher and chair of governors, the policy should also be reviewed at least annually or sooner if there is any reason to suspect it is no longer valid.
- **6.** As the policy is a management tool, it is likely to be one of the first documents you are asked to produce when visited by an HSE Inspector.

## A2: The Law Regarding Health and Safety Policies:

A written health and safety policy is a statutory requirement where an employer employs five or more people. It must be consulted with the employees & recognised trade unions, and shown to an HSE Inspector or Kent County Council (KCC) auditor if requested.

A robust safety policy demonstrates to staff, pupils and visitors that the organisation values their health, safety and welfare.

The allocation of responsibilities and the recording of particular arrangements to implement the policy encourage a clear approach to the management of health and safety.

For schools who are developing or revising their health and safety policy, this guidance and suggested detail can be presented to staff for consultation to add specific content, and staff can have adequate time to have an input into the policy contents. After any appropriate re-drafting, this can then be presented for approval to the school management team before final adoption by the governing body. Therefore, writing the policy in consultation with all staff clarifies the arrangements made and helps give them ownership.

This process also provides for information to be shared later with others such as visitors and contractors.

The policy will then be reviewed annually in line with the cycle on the management plan but will be amended if new legislation/procedures etc. make this necessary.

## Kent County Council Education Learning and Skills Directorate



Health and Safety at Work Act 1974

# HEALTH AND SAFETY POLICY STATEMENT of

## **Woodlands Primary School**

#### A2: Statement of Intent:

The Headteacher and Governors are committed to establishing and implementing arrangements that will:

- ensure staff and pupils are safeguarded when on school premises, or engaged in off-site activities (e.g. school trips, sports events etc.).
- ensure the premises for which they are responsible have safe access and egress for all staff, pupils and visitors.
- provide adequate facilities and arrangements for welfare.
- provide and maintain safe plant and safe systems of work without risks to health.
- ensure safe use, handling, storage and transport of articles.
- provide suitable information, training, instruction and supervision to keep all staff, pupils and visitors safe.

Signed:		Signed:	
	Headteacher	Chair of Govern	ors
Date:		Date:	

#### Section B - ORGANISATION

## **B1: Employer Responsibilities**

Kent County Council as the employer has a statutory duty in respect of health and safety in community and voluntary controlled schools to ensure that premises and people are healthy and safe.

The responsibility is devolved to the Headteacher, who has day to day responsibility for staff, pupils and others as 'officer in charge' of the premises.

The Headteacher will ensure the overall implementation of the policy.

### **B2: Headteacher Responsibilities**

- To ensure this policy is reviewed annually, or before earlier if there are any changes in circumstances
- To ensure that employee responsibilities regarding health and safety are included in their job description and that it is adequately received and understood
- To include health and safety issues in the school improvement plan, if necessary
- To carry out regular health and safety inspections (at least three times a year) and take remedial action as appropriate
- To undertake risk assessments, record significant findings, and review annually, or sooner if there is a change in circumstance
- To receive and deal promptly with raised issues or complaints about unsafe premises, equipment or work practices
- To liaise with KCC property and infrastructure support and/or the building maintenance consultants and/or with contractors to resolve property maintenance issues
- To ensure that the requirements of any enforcement officer (e.g. HSE Inspector, Environmental Health Officer, Fire Liaison Officer, or Environmental Agency Inspector) are properly addressed;
- To ensure that emergency evacuation procedures are in place and tested to ensure validity
- To ensure that adequate first aid provision is available and kept up to date at all times
- To report health and safety issues to the governing body on a regular basis
- To monitor and review all health and safety policies and procedures
- Seek advice from other organisations or professionals, such as the Health and Safety Executive, safety advisers etc. as and when necessary

**NB**: Tasks can be delegated to other staff members but the responsibility remains with the Headteacher.

#### B3: Governors' Responsibilities

- Responsibility for the health and safety of pupils lies with the governing body of the school, either as the employer of school staff or because it controls school premises (or both).
- The governing body will promote a strategic overview for health and safety.
- The governing body will take all reasonable measures to ensure that the premises and equipment on site are safe and do not put the health or safety of staff, pupils or visitors at risk while they are on the premises.

- The governing body of a community, voluntary controlled, community special and maintained nursery school must comply with any directions given by the LA concerning the health and safety of persons in school, or on school activities elsewhere.
- The governing body will make adequate provision for maintenance of the school premises and equipment, either within the KCC 'Classcare' scheme or within the school's delegated budget.
- The governing body will support and monitor health and safety within the school
- Review and monitor the effectiveness of this policy
- The governing body can consider appointing a governor to co-ordinate health and safety from a strategic point of view.

Name of Appointed Health and Safety Governor:	
Glenn Fisher	

## **B4: Staff Responsibilities**

- To read and fully co-operate with this policy
- Must take reasonable care of their own health and safety and that of others who may be affected by their actions
- Will co-operate with their employer on health and safety matters
- Will not interfere with anything provided to safeguard their health and safety or that of others
- Report practices, equipment or physical conditions that may be hazardous to their line manager and/or the appropriate member of staff
- Have a duty to report all health and safety concerns to the head teacher or their line manager

#### B5: Site Manager Responsibilities

The Site manager holds responsibility for the day to day maintenance and other buildings / grounds issues.

## They will:

- Ensure that any work that has health and safety implications is prioritised
- Report any concerns regarding unresolved hazards in school to the senior management team immediately
- Ensure that all work under their control is undertaken in a safe manner
- Carry out a daily check of the grounds and building to spot any disrepair or other hazards such as broken glass etc. in the play areas
- Ensure that all cleaning staff are aware of safe working practices, especially regarding reporting of hazards, the use of hazardous substances and manual handling
- Carry out a weekly test of the fire alarm
- Ensure all contractors are 'inducted' and shown the relevant risk assessments, asbestos records and are made aware of any fragile roofs or other hazards in the areas where they will be working

• Fully co-operate with health and safety arrangements during larger building projects.

#### **B6: KCC Infrastructure**

They will ensure that property matters for which the local authority as the employer has statutory responsibilities, (e.g. regular maintenance and testing of fixed electrical wiring or fixed gas appliances) are properly dealt with, (if necessary, by taking premises or fixed equipment out of use). The head teacher is responsible for liaising with KCC Infrastructure and/or the building consultants and/or with contractors from KCC preferred contractors list, to resolve property maintenance issues.

Dave Cox (Compliance Manager)
Email: dave.cox@kent.gov.uk
Phone: 03000 418154

#### **B7: Safety Representatives**

Safety representatives of a Trade Union have the following functions:

- Represent employees generally and when you consult them about specific matters that will affect the health, safety and welfare of the employees
- Represent employees when Health and Safety Inspectors from HSE or Local Authorities consult them
- Investigate accidents, near misses, and other potential hazards and dangerous occurrences in the workplace
- Investigate complaints made by an employee they represent about their health, safety or welfare in the workplace
- Present the findings of investigations to you the Headteacher
- Inspect the workplace
- With at least one other appointed representative, request in writing that you set up a health and safety committee and attend Health and Safety Committee and meetings as a representative of your employees.

Names of Trade Union Representatives:	
Contact details:	

Alternative Consultation Arrangements:

Contact details: Headteacher@woodlands.kent.sch.uk

Name of Employee Representative: Headteacher Vicki Lonie

## **B8: Consultation with Employees**

It is a legal requirement to consult with employees on health and safety issues. A Safety Committee is where formal consultation with employees takes place, but individual and group staff meetings are also appropriate forums for communication on health and safety matters and concerns.

Health and Safety is a standing item on all weekly staff briefing agendas.

## **B9: Information, Instruction and Supervision**

Under health and safety law it is a legal requirement to display or provide a leaflet version of the Health and Safety Law poster.

• A copy of the Health and Safety Law Poster can be found:

Location of Poster: Staffroom Oak Building

- Supervision of young workers/trainees will be arranged/undertaken/monitored by the head teacher or other delegated key members of staff.
- The Headteacher will supply adequate information, instruction and supervision for all staff, pupils and visitors to ensure their health and safety.

#### B10: Competency for Health and Safety Tasks and Training

- The Headteacher will ensure that all staff undertake induction training
- Training will be identified arranged and monitored by the head teacher and the governing body
- Staff are also responsible for identifying their own personal training needs and feeding this back to the Headteacher
- Training records will be easily accessible for audit purposes and will be kept up to date

Training records will be kept under the relevant staff's personal folder on SharePoint

## **B11: Monitoring**

- The Headteacher will check working conditions and ensure that safe working practices are being followed. Regular inspections will be undertaken of the school building and grounds three times a year.
- The Headteacher or delegated senior member of staff is responsible for investigating accidents although the accountability remains with the Headteacher
- The Headteacher or delegated senior member of staff is responsible for investigating work-related causes of sickness and absences although the accountability remains with the Headteacher
- The Headteacher is responsible and accountable for acting on investigation findings in order to prevent a reoccurrence.

#### Section C – ARRANGEMENTS

#### C1: School Activities

- The Headteacher will ensure that risk assessments are undertaken (this responsibility has been delegated to the Deputy Headteacher).
- the significant findings of all risk assessments will be reported to the governing body and to all relevant staff, contractors, visitors and all of those who may be affected
- any actions that are required to remove or control risks will be approved by the head teacher or their delegated responsible person
- the head teacher or delegated responsible person will check that the implemented actions remain effective, and that all risk assessments are reviewed on an annual basis or when the work activity changes, whichever is the soonest.

#### **Curriculum Safety Risk Assessments:**

A List of Risk Assessments is kept under Health and Safety in Sharepoint 'staff public'. Personal risk assessments are kept by the Headteacher.

### C2: Visitors

- All visitors shall be directed by clear signage to the reception and must report to the school office, where appropriate arrangements for the signing in and out and identity badges will be provided. Visitors who are not at school on a regular basis, who are not in possession of a DBS and have no safeguarding training will not be left unaccompanied on school premises. They will be required to wear a red lanyard, which indicates to all staff that the wearer must be accompanied by a member of staff.
- Emergency procedures including fire and safeguarding will be presented on screen when signing in on Entrysign.

## C3: Fire and Emergency Procedures

- The Headteacher is responsible for ensuring the fire risk assessment is undertaken, controls are implemented and that it is reviewed annually and kept up to date.
- Emergency exits, assembly points and assembly point instructions are clearly identified by safety signs and notices.

•

Names of fire wardens: Terry Revell, Ian Couldridge, Claire Gillick, Mark Burns, Yr5 TA, Rita Tarrant-Blick, Jo Stone, Kim Brogden, Helen Wilson, Vicky Newman

## Specify sites:

All rooms have clearly identified safety signs and notices.

Emergency evacuation will be practiced three times a year and a record will be kept by: SharePoint

• Regular testing of fire alarms will occur on:

Indicate when tests are to be carried out:

'Acorn' building: Weekly on Thursday 'Oak' building: Weekly on Tuesday

By the site manager or caretaker

Test will be carried out by either the Site Manager Terry Revell or the Caretaker, whoever is on that particular shift on the specified day

Specify where the log is kept: All drills are recorded on a Sharepoint form Responsible person/s for maintaining these records: SBM

## C4 Fire Fighting

Staff should only use fire extinguishers if trained in how to operate them safely. If trained, they should only use the extinguisher if confident to do so and not put themselves or others at undue risk. There should always be a clear escape available. Ensure the alarm is raised BEFORE attempting to tackle a fire.

All chemicals will be stored in accordance to the Control of Substances Hazardous to Health (COSHH) assessment. List of hazardous substances will be provided to fire officer in the event of a fire. See annex 9.

Name of Responsible Person for Fire Safety: Vicki Lonie - Headteacher with the support of the Site Manager

## C5: Maintenance of fire equipment

The Headteacher will ensure regular maintenance of:

- Fire extinguishers
- Fire alarms
- Fire doors
- Fire safety signs and identification of escape routes
- Emergency lighting and other emergency equipment

#### C6: Bomb Alerts

Bomb alerts/suspect packages will be dealt with in accordance with school's emergency planning arrangements. See annex 1

- The Headteacher is responsible for ensuring the bomb alert procedures are undertaken and implemented
- Guidance on bombs/suspicious devices or packages will be circulated to staff annually

#### C7: First Aid Arrangements

• The Headteacher will ensure that there are an appropriate number of designated and trained first aiders in the school

A list of first aiders and contact details can be found: in every room in both Oak and Acorn buildings

 The Headteacher will ensure that there are an appropriate number of first aid boxes, with basic instructions and locations clearly marked

The first aid boxes are located in: the medical rooms and in each classroom in both the 'Acorn' and 'Oak' buildings

Person with delegated responsibility: Kim Brogden (Administrative Assistant)

• A first aid risk assessment will be carried out by the head teacher to determine the above factors. See annex 2

The school will follow the procedure for completion of incident / accident records. KCC -HS157, HS160 and HSE - F2508, F2508A *See annex 3* 

- All reportable incidents under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR) will be reported to the HSE by the school.
- Advice should be sought if any doubt whether an accident is reportable

Delegated responsibility for reporting incidents: Kim Brogden (Administrative Assistant - Acorn Office) am/pm Helen Wilson (Administrative Assistant) - Acorn Office) am/pm

HSE Contact Details: Incident Contact Centre

www.hse.gov.uk

• Parents will be invited to complete the consent form for medical treatment or asked to complete the online form in accordance with school policy and DfE guidance.

## **C8: Information Technology**

- The Headteacher will ensure that suitable arrangements are in place for the safe use of Information Communication Technology.
- Information Communication Technology will be installed safely, with due consideration given to ventilation for server rooms and computer suites and to hazards such as asbestos and working at height.
- Where laptops are used, safe systems of work including charging and use of trolleys will be devised and implemented
- Assessments for users of Display Screen Equipment (DSE) will be carried out in accordance with the Health and Safety (DSE) Regulations 1992 (as amended in 2002).
- The KCC guidance on interactive whiteboards will be followed. See annex 11

## C9: Legal Requirements for Premises

- The school will comply with the requirements of the Workplace (Health, Safety and Welfare)
   Regulations 1992 with regard to facilities for staff such as lighting, heating, ventilation, space, condition of floors and general welfare facilities.
- The school will comply with the arrangements of the Education (School Premises) Regulations 1999 with regard to school facilities such as washrooms for pupils and staff, medical accommodation and indoor temperatures

#### C10: Safe Handling and Use of Substances

• The Headteacher is responsible for identifying all substances which need an assessment under the Control of Substances Hazardous to Health (COSHH) Regulations 2002

- The Headteacher or delegated responsible person will be responsible for undertaking COSHH assessments.
- The Headteacher will be responsible for ensuring that all relevant employees are informed about the COSHH assessments. See annex 4
- The Headteacher will be responsible for checking and ensuring they are satisfied that all new substances can be used safely before they are purchasing them
- COSHH assessments will be reviewed on an annual basis or when the work activity changes, whichever is the soonest

Responsible Person for Checking Cleaning Substances:	
Site Manager	

### C11: Inspection of Premises, Plant and Equipment

- The Headteacher will arrange for formal inspections of the premises, plant and equipment to take place three times a year and draw up an effective maintenance and improvement programme. See annex 6
- All identified maintenance will be implemented
- Routine checks may be undertaken by a combination of class teachers, governors, caretaking staff and the head teacher/deputy head using the checklists. See annex 5
- Access to store rooms; boiler rooms; tank and plant rooms should also be checked, including checking for inappropriate storage of ladders and other equipment in particular in and around intake cupboards
- Where damaged asbestos is encountered or suspected damaged, procedures, as laid down in the KCC Asbestos policy, will be followed

## C12: Asbestos Management

Property and Infrastructure Support will arrange for a management asbestos survey to be carried out every three years in line with KCC policy. The head teacher will ensure that the KCC asbestos management policy is followed. An asbestos docubox will be kept on reception and staff will ask all contractors to check the survey and sign to say that they are aware of where the asbestos is within the building. The head teacher or the delegated responsible person will monitor areas where asbestos material is present, record significant findings and arrange for remedial works to be carried out if necessary. All works undertaken will be updated in the asbestos survey on completion.

#### C13: Legionella Management

Property and Infrastructure Support will arrange for a water hygiene risk assessment to be carried out every two years in line with statutory requirements. Such assessments will identify if there are areas where conditions exist which could support legionella bacteria growth and pose a risk to building occupants, the survey will also list any works required; and include details of future monitoring

requirements that the school is responsible for. Therefore, all identified remedial works will be incorporated into the school's maintenance programme.

Monitoring of the water system is also a statutory requirement and the school will ensure this is undertaken. This will include taking temperature readings, recording these in the log book and de-scaling spray outlets.

Responsible person for monitoring and testing the water system monthly: Site Manager

## C14: Heating Oil Storage and Management Oil Fired Boilers

## Heating Oil Storage and Management

The Headteacher will ensure that there is an adequate risk assessment and spillage action plan in place to cover all eventualities in the event that the tank or bund fails or there is a release of heating oil during the delivery process, which causes heating oil to pollute the surrounding area or surface water drains and to share this information with all relevant staff. Measures should also be put into place to inform the relevant local authority and the Environment Agency.

A specific check list is available. See annex 7

Reference to section three of the KCC Emergency Planning Guidance for Kent Schools is also relevant. See annex 1

#### C15: Radon Management

There is no use of Radon in the school

#### C16: List of Risk Assessments, Policies and Procedures to complement this Policy

Can be found either on Sharepoint/Health and Safety/Risk Assessments or on Kelsi Website

- Asbestos management
- Bomb alerts
- Control of chemicals hazardous to health (COSHH)
- Display Screen Equipment (DSE)
- Electricity at work including portable appliance testing
- Emergency planning
- Fire including responsibilities of the fire wardens
- First aid requirements
- Infection control
- Legionella
- Lone working
- Managing contractors
- Manual handling
- Off-site visits
- Pedestrian and people movement

- Playground supervision
- School events
- Slips, trips and falls
- Stress management
- Violence and aggression
- Working at height

## SECTION D – ON-LINE ANNEXES AND REFERENCES

Annex 1: Emergency Planning Guidelines for Kent Schools (Assistance with this document can be found on Kelsi) <a href="http://www.kelsi.org.uk/running-a-school/maintenance-and-operations/emergency-planning">http://www.kelsi.org.uk/running-a-school/maintenance-and-operations/emergency-planning</a>

**Annex 2:** Guidance on First Aid for Schools – A Good Practice Guide Managing Medicines in Schools and Early Years Settings

http://www.kelsi.org.uk/policies-and-guidance/health-and-safety-guidance/risk-assessment

Annex 2B: COVID-19 guidance on First Aid for Schools

Annex 3: Incident/Accident Reporting

http://www.kelsi.org.uk/policies-and-guidance/health-and-safety-guidance/accident-reporting

Annex 3B: i) Putting on PPE

**Staff Sharepoint** 

Annex 3B: ii) Taking off PPE

Staff Sharepoint

Annex 3C: COVID-19 Reporting an Accident (RIDDOR)

COVID-19 HSE Website

Annex 3D: COVID-19 Procedures for Expected Case of Coronavirus

Staff Sharepoint

Annex 3E: COVID-19 NHS Guidance on symptoms

https://www.nhs.uk/conditions/coronavirus-covid-19/symptoms/

Annex 4: COSHH Risk Assessments on Kelsi

http://www.kelsi.org.uk/policies-and-guidance/health-and-safety-guidance/chemicals-coshh

Annex 5: Inspection Proforma on Kelsi

http://www.kelsi.org.uk/policies-and-guidance/health-and-safety-guidance/management-of-health-safety

Annex 6: Fire Policy and other linked Documents <a href="http://www.kelsi.org.uk/policies-and-guidance/health-and-safety-guidance/fire">http://www.kelsi.org.uk/policies-and-guidance/health-and-safety-guidance/fire</a>

**Annex 7:** Heating Oil Storage and Management Checklist <a href="http://www.kelsi.org.uk/policies-and-guidance/health-and-safety-guidance/risk-assessment">http://www.kelsi.org.uk/policies-and-guidance/health-and-safety-guidance/risk-assessment</a>

Annex 8: Asbestos Policy and Docubox Contents <a href="http://www.kelsi.org.uk/policies-and-guidance/health-and-safety-guidance/premises-and-contractor-management">http://www.kelsi.org.uk/policies-and-guidance/health-and-safety-guidance/premises-and-contractor-management</a>

**Annex 9:** List of Hazardous Substances on the Premises <a href="http://www.kelsi.org.uk/policies-and-guidance/health-and-safety-guidance/chemicals-coshh">http://www.kelsi.org.uk/policies-and-guidance/health-and-safety-guidance/chemicals-coshh</a>

**Annex 10:** Health and Safety of Pupils on Educational Visits <a href="http://www.kelsi.org.uk/policies-and-guidance/health-and-safety-guidance/curriculum-topics">http://www.kelsi.org.uk/policies-and-guidance/health-and-safety-guidance/curriculum-topics</a>

Annex 11: Safe Use of Interactive Whiteboards <a href="https://www.kelsi.org.uk/policies-and-guidance/health-and-safety-guidance/curriculum-topics">https://www.kelsi.org.uk/policies-and-guidance/health-and-safety-guidance/curriculum-topics</a>

#### E1: Useful contacts

Kent County Council Health and Safety Unit

Email: healthandsafety@kent.gov.uk

Health and Safety Advice Line: Tel: 03000 418456

Location: Room 1.04 Sessions House, Maidstone, ME14 1XQ

Outdoor Education Unit

Tel: 03000 410901

Email:Outdoor.Education@theeducationpeople.org

Location: The Swattenden Outdoor Centre, Swattenden Lane, Cranbrook,

**TN17 3PS** 

Insurance and Risk Management

Lee Manser - Insurance Manager.

Tel: 03000416428, Email: lee.manser@kent.gov.uk

Location: Room 2.53 Sessions House. Maidstone. ME14 1XQ

Staff Care Services

Occupational Health, Mediation Services, and Support Line. Tel: 03000

411411 Email: occupational.health@kent.gov.uk

Location: Park House, 110-112 Mill Street, East Malling, ME19 6BU

Classcare

Email: classcare.enquiries@kent.gov.uk

Location: Room 1.44, Sessions House, County Hall, Maidstone, Kent, ME14

1XQ

Health and Safety Executive

Location: International House, Dover Place, Ashford, TN24 1HU

Kent Fire & Rescue Service

The Godlands

Straw Mill Hill

Tovil

Maidstone

ME15 6XB

Tel: 01622 692 121

RIDDOR Incident Contact Centre

Website: www.riddor.gov.uk.

Tel: 0845 345 0055 (For reporting fatal/ specified, and major incidents only)

Online reporting: https://www.hse.gov.uk/riddor/report.htm

**Employment Medical Advisory Service (EMAS)** 

The Executive's Employment Medical Advisory Service (EMAS).

Tel: 02089 958503

Location: PO Box 3087, London W4 4ZP

Association for Physical Education.

Tel: 01905 855584, Email: <a href="mailto:enquiries@afpe.org.uk">enquiries@afpe.org.uk</a>

Website: http://www.afpe.org.uk/

Location: 117 Bredon, University of Worcester, Henwick Grove, Worcester.

WR2 6AJ

Sustainability & Climate Change Team

Deborah Kapaj – Sustainable Estates Programme Manager

Tel: 03000 410237

Location: 2nd Floor, Invicta House, County Hall, Maidstone. ME14 1XX

DOCUMENT HISTORY	
Date	Summary of Changes
12 February 2021	Adopted current KCC Model Policy
24 February 2022	Adopted current KCC Model Policy
20 February 2023	Adopted current KCC Model Policy
	C1 removed duplicate line
	C2 removed COVID line
	C2 removed leaflet, procedures will be shown on screen when
	signing in
	C3 removed COVID line
	C7 parents can now complete an online form to administer
	medication
	C7 removed COVID line
	Removed names and added titles
22/02/24	Adopted current KCC Model Policy