

ESCP Europe Business School

Health & Safety Policy – V4.0

November 2023

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1. Policy Statement

This is the Health and Safety Policy Statement of ESCP Europe Business School, which aims to take at all times all reasonable measures to:

- Ensure the health, safety and welfare of employees, so far as is reasonably practicable, to comply with the Health & Safety at Work Act 1974 & other legislation made under the Act.
- Provide adequate control of the health and safety risks from work activities.
- Consult with employees on matters affecting their health and safety.
- Provide and maintain safe plant and work equipment.
- Ensure safe handling and use of substances.
- Provide suitable information, instruction, training & supervision for employees.
- Ensure that employees are competent to do their work.
- Prevent accidents and work-related ill health.
- Maintain safe and healthy working conditions.
- Review and update this policy as necessary.
- Treat health and safety with equal importance to financial management.
- Make available sufficient financial resources to implement the policy.

The Board of Trustees will set the direction for effective health and safety management. Board members will need to establish a health and safety policy which is an integral part of the organisation's culture.

The Chairman of the Board will take the lead in ensuring the communication of health and safety duties and benefits throughout the organisation. The Senior Management Board (the "SMB") will develop policies to avoid health and safety problems and will respond quickly where difficulties arise or new tasks are introduced.

Delivering this strategy depends on an effective management system to ensure, so far as reasonably practicable, the health and safety of employees, students and members of the public.

The organisation will aim to protect people by introducing management systems and practices that ensure risks are dealt with sensibly, responsibly and proportionately.

Monitoring and reporting are vital parts of a health and safety culture. Management systems will allow the Board to receive both specific (e.g. incident-led) and routine reports on the performance of health and safety policy.

A formal review of health and safety performance is conducted by the Health and Safety Committee. The Committee's minutes are part of a programme to allow the Board to establish whether essential health and safety principles - strong and active leadership, worker involvement, and assessment and

review - have been embedded in the organisation. It offers information to the Board on whether the system is effective in managing risk and protecting people.

Each year, an annual review of all aspects of health and safety is presented to the Trustees.

Signed

A handwritten signature in black ink, appearing to be 'KR' or similar, written over a light blue horizontal line.

UK Dean
Kamran Razmdoost

Date: November 2023
Review Date: November 2024

2. Organisation

The organisation, ESCP Europe Business School places responsibilities on the Health and Safety Committee, Board of Trustees and all staff as it relates to the management of all Health and Safety procedures onsite.

The Health and Safety Committee:

The Health and Safety Committee reports to the Board of Trustees and is to provide it with an annual report on the School's Health and Safety procedures and performance.

The Health and Safety Committee also:

- Oversees the development and monitors the implementation of the School's Health and Safety procedures and code of practice, keeping under constant review the School's compliance with Health and Safety legislation;
- Monitors trends in occupational ill health, near misses, accidents, dangerous occurrences and environmental incidents; and
- Ensures that the recommendations of inspections and audits carried out internally by the School's Health and Safety advisor and/or any external regulatory authority are implemented.

The Committee is chaired by the UK Director of Estate and Operations assisted by the Committee Manager (the School's Reception Services Manager) in charge of the agenda of each Committee, the preparation of the pack for each Health and Safety Committee and of the writing up and circulation of the minutes of each Committee to all participants. For the purpose of this document, any reference to the Health and Safety Manager relates to the UK Director of Estate and Operations.

A nominated member of each department of the School attends the meeting on a quarterly basis alongside the facilities manager and the School's external Health and Safety advisor. Other advisors may be invited to attend the committee on an ad hoc basis.

The Board of Trustees:

- Plans the direction for health and safety; the Board should:
 - Own and understand the key safety issues involved;
 - Decide how best to communicate, promote and champion health & safety.
- Delivers health and safety; members of the board should ensure that:

- Health and safety arrangements are adequately resourced;
- They obtain competent health and safety advice;
- Risk assessments are carried out;
- Employees or their representatives are involved in decisions that affect their health and safety.
- Monitors health and safety; the Board should ensure that:
 - Appropriate weight is given to reporting both preventive information (such as progress with training and maintenance programmes) and incident data (such as accident and sickness absence rates);
 - Periodic audits of the effectiveness of management structures and risk controls for health and safety are carried out;
 - The impact of changes such as the introduction of new procedures, work processes or products, or any major health and safety failure, is reported as soon as possible to the board;
 - There are procedures to implement new and changed legal requirements and to consider other external developments and events.
- Reviews health and safety; the Board should review health and safety performance at least once per year. The review process should:
 - Examine whether the health and safety policy reflects the organisation's current priorities, plans and targets;
 - Examine whether risk management and other health and safety systems have been effectively reported to the board;
 - Report health and safety shortcomings, and the effect of all relevant board and management decisions;
 - Decide actions to address any weaknesses and a system to monitor their implementation;
 - Consider immediate reviews in the light of major shortcomings or events.

Managers

Managers should actively manage health and safety at work and should;

- Ensure that established safe working practices are followed
- Have knowledge & understanding of hazards in their workplace
- Know the capabilities & limitations of staff
- Ensure that all required risk assessments are undertaken and documented
- Action the recommendations of risk assessments
- Ensure that suitable induction and ongoing training is provided and recorded
- Carry out regular planned inspections of the workplace
- Consult with staff on health, safety, fire & other risks
- Ensure that accidents, incidents and dangerous occurrences are reported, investigated and properly dealt with

- Develop and co-ordinate any local health & safety plan
- Provide information and instructions on health & safety to staff
- Ensure health & safety responsibilities are written into all job descriptions
- Visibly manage health and safety in the workplace
- Discipline breaches of health and safety.

Employees

All employees should:

- Take reasonable care for the health and safety of themselves and others who may be affected by their acts or omissions at work
- Cooperate with the employer on health and safety matters
- Ensure that established safe working practices are followed
- Follow safety instructions, safety rules and safety training
- Report unsafe acts or conditions in the workplace
- Report all health or safety concerns to the Health & Safety Manager
- Use any safety equipment provided
- Not interfere with anything provided in the interests of health and safety.

UK Director of Estate and Operations

The UK Director of Estate and Operations (the “Health and Safety Manager”) has day-to-day responsibility for ensuring this policy is put into practice and should also:

- Ensure that risk assessments have been undertaken.
- Report risk assessment findings to Directors.
- Seek approval from Directors on action required to remove or control risks.
- Ensure action required is implemented.
- Check that implemented actions have removed or controlled risks.
- Review risk assessments at least annually or when the work activity changes, whichever is sooner.
- Recruit fire marshals and ensure that they are trained.
- Promote safe working for staff, interns, contractors and visitors.
- Encourage co-operation between staff and management.
- Encourage employee consultation through employee representatives.

This may be through a recognised union or where there is no trade union, either directly or through an elected representative.

- Identify all equipment needing maintenance.
- Ensure effective maintenance procedures are established.
- Ensure that maintenance required is carried out.

- Receive reports of problems with equipment or the workplace.
- Check that new equipment meets health & safety standards before purchase.
- Identify any substances requiring a COSHH (Control Of Substances Hazardous to Health) assessment.
- Ensure that COSHH assessments are undertaken.
- Ensure that actions identified in the COSHH assessments are implemented.
- Ensure that relevant employees are informed about COSHH assessments.
- Check that new substances can be safely used before they are purchased.
- Review COSHH assessments at least annually or when the work activity changes, whichever is sooner.
- Liaise with the external safety advisor to arrange safety input as required.

Health and Safety Advisor

The safety advisor advises as requested and carries out work as instructed on matters including:

- Risk Assessment
- Policy and procedure writing.
- Accident and incident investigation.
- Training for health and safety.
- Monitoring, reviewing, verification and audit of health and safety.
- Enforcement by the HSE, Environmental Health Officer, London Fire Brigade or the insurers.
- Communication of health and safety.
- Consultation between employees and management.

Since 2014, Jem Safety Management Ltd has been operating as the external Health and Safety advisor of the School.

It is represented by Martin Marmoy-Haynes who can be contacted as follows:

martin@jemsafety.co.uk

01708 226 874

3. Arrangements

This section of the safety policy deals with the details of how the organisation manages health and safety. It covers management and administrative issues and lists common activities carried out by staff.

The section includes details on all subjects likely to be of interest or concern to staff.

The subjects are listed alphabetically and by:

- Statute, that is the law covering each issue, such as *first aid* or
- Hazard, for example *manual handling* or
- Subject, for example *contractors* or *safety committee*.

Access and Egress

Safe access is maintained to all sites where staff visit, including UK locations and any overseas business trips. Persons must report any hazards (potential for harm) to the Health & Safety Manager, the safety advisor or the local contact or liaison officer where the work is carried out off site.

Accident & Incident Investigation and Reporting

Employees must report any accident, incident, ill health or risk that is observed.

Incidents involving any person must be reported and this could include staff, interns, temporary workers, contractors, service engineers, students or clients.

Following any accident, first aid would be given as soon as possible. If there is any doubt over the seriousness of the injury, the injured person should be sent to the nearest hospital Accident and Emergency department. The Health & Safety Manager will investigate any accidents.

Any case of a work-related cause of sickness absence will be investigated by the Health & Safety Manager.

All incidents must also be reported. These are events, which under slightly different circumstances could have caused harm. Examples of incidents are: fire exit route obstructed, fire doors wedged open and left unattended, spillage on floor not cleared up, damaged electrical cable or cable trip hazard. These may be reported by email to the Health & Safety Manager.

The safety advisor will normally investigate all of the above events due to the broad experience required. The Health & Safety Manager is responsible for acting on the investigation findings to prevent a recurrence.

Asbestos

The organisation ensures that an up to date asbestos survey and management plan is in place. Suitable actions are taken to either remove asbestos or to encapsulate, label & monitor it.

Auditing

The School audits the management system for safety. The main objectives of safety audits are to examine the safety management system, to check that standards are adequate and to identify shortfalls in performance.

Bomb Alert

The procedure for bomb threat evacuation, receiving a bomb threat or dealing with a suspect package is contained in a separate document which has been circulated to key staff, in the form of a checklist.

Car Park and Roads

Car parking places are very limited and any requirement should be discussed with the Health & Safety Manager.

Children

If staff bring children into the workplace, they must be supervised at all times and a short risk assessment should be undertaken.

Communication with Employees

We comply with The Health and Safety Information for Employees Regulations 1989 which require organisations to communicate information on health, safety and welfare to employees by the use of The Health and Safety Law poster displayed in a prominent position.

Suitable communication of safety information is made to employees, students, trainees and other users of the premises. Visitors should be informed, where necessary, through signs and posters in public areas.

We communicate information on health, safety and welfare by use of;

1. The Health and Safety at Work – What You Need to Know poster
2. Routine management briefings and bulletins
3. Safety information in the Employee Handbook.
4. An annual Health and Safety Report.
5. Email briefing.

A Health and Safety Notice Board is located in an area easily accessed by staff. The recommended items to be placed on the notice board are the health and safety poster, health and safety representative's names, first aider's names and locations, the first aid box location, the fire policy and fire marshal names, the health & safety policy, risk assessments and safety briefings.

Construction Site Safety

The *Construction (Design and Management) Regulations 2015* seek to integrate health and safety into the management of construction projects and to encourage everyone involved to work together to improve the planning and management of projects; identify risks early on; target effort where it can do the best in terms of health & safety; and discourage unnecessary bureaucracy. These Regulations are intended to focus planning and management throughout construction projects, from design concept onwards. Duties are placed on Clients; The Principal Designer; Designers; The Principal Contractor; Contractors and the self-employed.

We would fully comply wherever CDM applies to the work of the organisation and will follow the CDM 2015 regulations for any works taking place onsite.

We will refer to the Construction Skills Certification Scheme (CSCS), which covers relevant construction hazards and training.

Consultation with Employees

The Consultation with Employees Regulations 1996 require that where there is no representation by safety representatives, the employer must consult non-union employees in good time regarding matters of health and safety. We encourage open communication to discuss safety matters.

Contractors

Contractors working within the organisation must comply with all rules and safety regulations relating to their work. Contravention of regulations will result in immediate removal from site, breach of contract conditions and possible involvement of the regulatory authority. Agency workers

and contractors will only be appointed if they pass the vetting procedure, which will include health and safety elements.

The Contractor Safety Assessment is run onsite by the Facility Management Team, Bouygues Energies and Services.

Control Of Substances Hazardous to Health (COSHH)

The externalised Facility Management Team carry out, on behalf of the School, a full written COSHH assessment for the handling of any substances hazardous to health in the workplace. The Facility Management Team will be able to provide, upon request, a suitable & sufficient full written COSHH assessment. The Assessment of the Risk should include; Hazardous Properties, Health Effects, Exposure level, type & duration, Work conditions including quantity of substance, Activities, such as maintenance, where potential for high exposure level and Workplace Exposure Limits.

Disabled Persons

The organisation will consider any reasonable adjustments required to assist disabled employees. Sensible consideration will be given to the additional risks to disabled staff, for example the higher and possibly unacceptable risk to a deaf person, where they might be unaware of danger or warning sounds.

Employees, students, trainees and other users of the premises are briefed on the requirements of the Equality Act 2010. A simple awareness and training programme are used to inform staff that it is unlawful to discriminate against any people by treating disabled employees less favourably for a reason related to their disability, without justification.

The safety advisor will carry out a Personal Emergency Evacuation Plan (PEEP) for any mobility-impaired person in the premises and if necessary will inform the fire marshals. The safety advisor should be informed of any mobility-impaired person by the Health & Safety Manager.

Display Screen Equipment (DSE)

We carry out workstation postural assessments and provide appropriate equipment for all staff spending a significant time on DSE work. The daily routine of DSE users will be managed to ensure suitable breaks in the work of approximately five to ten minutes per hour with no more than two hours between breaks. Eye and eyesight testing will be provided free of charge to those who request it and training and information will also be provided. Records of all assessment are kept.

Electricity

Electrical testing is carried out regularly to comply with the Electricity at Work Regulations 1989. This applies to all portable electrical plug-in equipment.

If Portable Appliances are required, they are subject to Portable Appliance Testing (PAT) at the frequency determined by the competent person (electrician).

Fixed Appliances comprising any building wiring, sockets, lighting and earthing systems should be subject to a Periodic Inspection Report at least every five years.

Emergency Plans

Emergency Plans are drawn up for all foreseeable risks including fire, bomb Alert medical emergency, gas leak or spillage.

Enforcement of Health and Safety

Any correspondence received from the Government's enforcing authorities; the Health and Safety Executive (HSE) or Environmental Health Officer (EHO); including improvement or prohibition notices, must be communicated to the Health & Safety Manager and safety advisor immediately.

Environmental Policy

The School welcomes its legal responsibilities under the *Environmental Protection Act 1990* and is committed to reducing the amount of waste and emissions produced by its activities. All users of the premises are encouraged to take an active part in its environmental initiatives.

It is the environmental policy to manage all of the School's effects on the environment:

- Effluent (Thames Water - Water Regulations Inspection of toilets & kitchen)
- General waste (bins emptied daily)
- Sanitary waste (bins emptied monthly)
- Recycling (paper, card & toner cartridges from office use)
- Energy (gas & electricity consumption to be reduced)
- Hazardous waste (batteries only).

Fire

We place the highest importance on fire safety and compliance with;

The Regulatory Reform (Fire Safety) Order 2005
The Management of Health and Safety at Work Regulations 1999.

A separate Fire Emergency Plan documents the School's fire safety strategy in detail.

The separate fire risk assessment identifies fire hazards and makes recommendations for improvement.

The Health & Safety Manager is responsible for ensuring that the fire risk assessment is undertaken and implemented.

Employees have a duty to ensure that they know the action to take in the event of fire.

Fire exit routes are checked by fire marshals every other month and daily by the Facility Management Team.

Fire extinguishers and other fire safety equipment are maintained and checked by a contract service company at suitable intervals and this is arranged by the Health & Safety Manager with the assistance of the Facilities Team.

Three to four day-time fire drills are carried out annually.

First Aid

We comply fully with the *Health & Safety (First Aid) Regulations 1981*.

Adequate numbers of first aiders (First Aiders at Work and Emergency First Aiders at Work) are trained to ensure a swift response at all times that the workplace is occupied.

The names of all trained first aiders are displayed on the Health and Safety Notice board.

First aid boxes are kept with the first aiders and at strategic locations within the School.

An accident book is kept at reception. The first aider providing care must ensure that the accident form is completed. The accident form must be removed from the book and sent to the Health & Safety Manager immediately; in the case of a serious incident, this should be carried out by hand delivery. Upon receipt of a first aid report, the Health & Safety Manager where necessary conducts or direct an investigation. The safety advisor will normally investigate all accidents.

If an accident is reportable to the enforcing authority, the Health & Safety Manager will discuss and confirm this with the safety advisor who will make the report.

Floors, handrails

Government statistics show an alarming number of slips, trips and falls are taking place even on level surfaces such as in offices and on pavements. Approximately 33,000 persons fall in an average year at work. One or two of these falls are fatal with 20,000 serious injuries and broken bones.

With this in mind, all staff must maintain a safe and clear floor in all work areas and the use of handrails when on stairs is strongly encouraged. Staff must report immediately any risks noted to the Health & Safety Manager.

Food Safety

We rigorously manage food safety to minimise the risk to all those using the School's facilities. This is also supported by taking part in the *Safer Food Better Business* campaign from the Food Standards Agency. The School's Café Corner Manager has specific training and certificates as it relates to the Food Hygiene Standards.

Gas Safety

The Facilities Team is responsible, under the PPM plan (planned preventive maintenance), for the testing of any gas burning equipment in the premises, to comply with the Gas Safety Regulations and GasSafe guidelines. If anyone thinks they can smell gas, they must follow TRANSCO rules;

- DO NOT turn electric switches on or off
- DO NOT allow smoking in the building
- DO NOT use naked flames
- TURN OFF the gas supply at the valve or meter
- KEEP THE AREA WELL VENTILATED to get rid of the gas
- CALL the National Helpline now, 24-hours free of charge on 0800 111 999.

Glazing

The *Workplace (Health, Safety and Welfare) Regulations 1992* define safe standards for glazing. A safety material is defined as inherently robust such as polycarbonate, or glass which breaks safely such as laminated or toughened glass, or ordinary annealed glass meeting certain thickness criteria.

Any glass below shoulder height in a door or door side panels and any glass below waist height in any windows should be a safety material. Where large panes of glass could be walked into, they are marked to make them apparent.

We ensure that only safe and compliant glazing is present.

Health and Safety at Work Act 1974

The School is responsible under the Act and comply as below.

Employer's Responsibilities (Section 2 of Act);

The Act requires that employers ensure, so far as is reasonably practicable, the health, safety and welfare of employees, in particular by:

- Providing & maintaining safe systems of work
- Ensuring safe storage, handling, use & transport of articles & substances
- Providing adequate information, instructions, training & supervision
- Maintaining safe premises and workplaces
- Providing a safe working environment & adequate welfare facilities.

Duty of employer to other persons (Sections 3, 4 of Act);

- Take care of self-employed persons
- Take care of members of the public
- Take care of employees of other organisations

Employee's Responsibilities (Section 7 of Act);

- Employees are responsible for the health, safety and welfare of themselves and others at work, who may be affected by their acts or omissions.

Manager's Liabilities (Section 37 of Act);

- Personal prosecution of members of the management is possible in certain circumstances
- A manager can be charged as well as, or instead of, the employer if the offence involves their consent, connivance or negligence.
-

Home Working

Home Working is fully embedded into the School's working arrangements and options. The safety of these persons is ascertained by the completion of a Display Screen Equipment assessment and an electrical safety check of any equipment provided by the organisation as well as by any relevant risk assessment carried out by the School's Health and Safety advisor.

Induction

Induction training is provided using the separate health and safety induction training document which includes a record sheet for signature by the person giving the induction and the person receiving the training. The training includes health, safety, fire, security, personal safety and the

environment and is delivered by the Health and Safety Manager as well as the HR manager to all new students and staff arriving at the School.

Information for Employees

The Health and Safety Law poster is displayed on the health and safety notice board.

Health & safety advice is made available from the School's Health & Safety Consultant (Safety Advisor), Martin Marmoy-Haynes, whose details are available from the Health & Safety Manager.

The supervision of young persons will be arranged and monitored by the Health & Safety Manager.

Where the School's employees will be working at another employer's location, the Health & Safety Manager will ensure that they are given any relevant health and safety information.

Ladders

The School's Facility Management contractor will provide and inspect ladders required onsite.

Legionnaires' disease

The risk of Legionnaires' disease amongst normal healthy staff is exceedingly low. However, a water hygiene risk assessment is completed to identify any potential problems and action is taken to manage the risk by engineering controls and disinfection where necessary with regular legionella and water tests carried out by professionals under the PPM plan as set out by Bouygues Energies and Services.

Lifting Equipment

All lifting equipment including passenger lifts, are subject to a thorough examination and maintained as required by the LOLER Regulations 1998. The responsibility for this is with the Facilities Management Team and implementation is monitored to ensure the School's staff and students are safe at all times.

Lighting

Natural lighting is used to carry out work wherever possible. Suitable internal and external lighting is provided throughout the premises and it is unlikely that lighting levels would be too low. If any staff have concerns over lighting levels then they should consult the Health & Safety Manager for assessment. A light level survey is carried out where required and systematic emergency lighting testing is part of Bouygues' PPM plan.

Maintenance

Suitable maintenance is provided throughout the premises to ensure the health, safety and welfare of all staff and visitors.

Management of Health and Safety at Work Regulations 1999

We comply fully with the regulations, in particular to make a suitable and sufficient risk assessment of work activities, considering all those likely to be present.

- We follow the Prevention principles which set out a hierarchy to follow: avoid the risk, evaluate, combat at source, adapt the work to the person, adapt to new technology, replace with something less dangerous, use systems that protect all staff and finally give instructions to employees.
- Arrangements are put in place to manage health and safety through the recommended system; Plan, Organise, Control, Monitor and Review.
- A competent person is appointed to assist with health, safety and fire issues.
- Procedures are put in place for serious and imminent danger.
- Contacts with external services are made, for example, for fire safety familiarisation (LFB).
- Information for employees are provided on risks, procedures and details of the competent person.
- Persons from outside undertakings hiring the School's facilities would be provided with safety information although this currently does not take place.
- Employee capability is considered and adequate safety training is provided.
- Temporary workers (fixed term contracts and agency) are provided with health and safety information.
- The health and safety of any new or expectant mothers is assessed.
- Staff are instructed to notify their employer of pregnancy so that we can take any actions required to ensure health & safety.
- Young persons are protected at work from health and safety risks, which are a consequence of their lack of experience, maturity or awareness of potential risks.

Manual Handling

Once risks have been identified, The Manual Handling Operations Regulations state a clear hierarchy of measures for employers to follow;

- **Avoid** hazardous manual handling operations so far as is reasonably practicable.
- **Assess** any hazardous manual handling operations that cannot be avoided.
- **Reduce the risk** of injury from those operations so far as is reasonably practicable.

Manual handling assessments are completed for hazardous tasks and we reduce the risk of injury by the provision of suitable training, equipment and numbers of staff to carry out the task. Training includes practical demonstrations of typical manual handling tasks & the issue of information on safe moving and handling.

The physical suitability of the employee to carry out the operation will be assessed by the relevant manager or the Facilities Management Team, considering; clothing, footwear or other personal effects he/she is wearing; his/her knowledge and training; and whether the employee is within a group of employees identified by a general assessment as being especially at risk.

Mobile Phones

We recognise the balance between the importance of mobile phones and the need for courtesy in environments where peace and quiet are required and the School's mobile phone policy is below.

General Safety Rules

- Use mobiles only where safe
- Consider whether having a conversation on the phone and carrying out work at the same time are compatible
- Consider whether one is distracting others
- Minimise use and use a normal landline phone where possible
- Never use a hand-held mobile whilst driving

Noise

The working environment for many of the School's staff is extremely unlikely to give rise to unacceptable noise levels. If there is an apparent risk, a noise risk assessment will be completed, made by observation of practices, reference to information on probable noise from equipment and measurement of noise levels if necessary. The three exposure values specified in the regulations will be complied with.

Where required we will follow the guidelines to eliminate or control noise; provide suitable hearing protection; ensure that anything provided is properly used; ensure any noise control equipment is properly maintained; ensure that anyone at risk uses personal hearing protection where required; and provide suitable health surveillance, information, instruction, training and supervision to ensure compliance.

Occupational Health

A 24/7 helpline facility with the employee assistance company (“Empathy”) is available to all permanent staff and students to assist them with any issue relating to psychological issues, stress or temporary ill-health.

The contacts of the nearby pop-in clinic are available from the HR department and the programme office.

Personal Protective Equipment (PPE)

We will follow the Personal Protective Equipment at Work Regulations 1992 which require that the provision of Personal Protective Equipment (PPE) be as a last resort and the Personal Protective Equipment at Work Regulations 2022. Where necessary a PPE risk assessment will be carried out. We will ensure that they meet all requirements as defined for compatibility; assessment; maintenance and replacement; accommodation; and information, instruction, and training.

Regarding the provision of PPE;

Employee (Limb (a) worker) – ESCP will provide PPE.

Casual employees / work under contract (Limb (b) workers) – ESCP will provide PPE.

Self-employed workers - worker to provide PPE.

We will ensure that PPE is appropriate for the risks, the conditions, and the period for which it is worn; that PPE takes account of ergonomic requirements and the state of health of the user; and that PPE is provided for individual users where it is necessary that it is hygienic (i.e., used on the skin); that all types of PPE used simultaneously are compatible; and that demonstrations in the wearing of PPE are provided where required.

We will follow the HSE guide; Personal Protective Equipment at Work Regulations 1992 (as amended) L25 4th Edition 2022.

Pregnant Workers

A risk assessment is carried out where required to consider exposure of any pregnant worker and the unborn child to the hazards from physical agents, chemical agents, biological agents, working conditions and hazards from processes.

Activities to be considered also include; manual handling; ergonomics; balance; use of restrictive protective clothing; sitting or standing for long periods; display screen equipment operation; infection risks; violence and lone working. Risk assessments identify any risks to expectant mothers and the unborn child, or new mothers. Where these risks cannot be totally avoided, we either:

- Alter the working conditions or hours of work if it is reasonable to do so and would avoid the risks, or if that is not feasible
- Identify and offer suitable alternative employment that avoids the risks, or if that is not feasible
- Suspend her from work on full pay in line with The Employment Rights Act 1996.

The above take effect as soon as the organisation has been notified, in writing, by the employee who is a new or expectant mother.

Pressure Systems

Pressure systems within any plant rooms are inspected by the School's designated insurance surveyor as required by law.

Public Protection

Protection of members of the public is a priority and this is achieved by suitable lighting, signing and observation of areas where they are allowed within the premises. Front of house staff are trained and authorised to effectively manage health and safety of the public at any events where they are permitted into the premises.

Reporting of Injuries, Diseases and Dangerous Occurrences

The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR) defines what must be reported to the HSE - see the information guide [Reporting Accidents & Incidents at Work RIDDOR INDG453 Revision 1 10/2013](#) and this guidance is followed by the School's nominated persons in the case of any work-related accidents, namely the HR manager in conjunction with the Health and Safety manager. We comply with the requirements for;

- Types of reportable injury (Deaths, Specified injuries to workers, Over-seven-day injuries to workers & Injuries to non-workers)
- Reportable occupational diseases (Reportable Work-related Illness)
- Reportable dangerous occurrences
- Reportable gas incidents
- Recording requirements
- Reporting requirements (online or telephone).

Any incidents will be reported to the HSE Incident Contact Centre by the Health & Safety Manager or the Safety Advisor.

Risk Assessment

The Government's guide to Risk Assessment makes the following definitions;

Hazard is the potential for harm, for example, slippery floors, fire or electricity.

The **likelihood of occurrence** or chance of any hazardous event taking place must also be considered during a Risk Assessment.

Risk is defined as hazard severity multiplied by likelihood of occurrence of an incident. In assessing a risk the following definitions are used:

Hazard

- 1 – Non-injury
- 2 – Seven-day injury or less
- 3 – Over seven-day injury
- 4 – Major injury (RIDDOR)
- 5 – Death

Likelihood of Occurrence of Incident

- 1 – Remote
- 2 – Unlikely
- 3 – Possible
- 4 – Likely
- 5 – Certain or near certain

Examples of hazards using the above classification are:

<i>Hazard</i>	Health	Safety
1 Non-injury	Eye irritant chemical container left open but no one exposed	Sharp nail protruding into workplace but no one cut
2 Seven-day injury or less	Irritation or discomfort from breathing in solvent fumes	Minor cuts, bruises or burns
3 Over seven-day injury (RIDDOR)	Partial hearing loss, work related upper limb disorder, back pain	Broken finger, thumb or toe, lacerations, burns, serious sprains
4 Major injury (RIDDOR)	Loss of consciousness caused by asphyxia or by exposure to a harmful substance, acute illness requiring medical treatment	Amputation, dislocation of shoulder, hip or knee, loss of sight, chemical or hot burn to the eye or any penetrating eye injury
5 Death	Inhalation of cyanide or prolonged exposure to asbestos fibres	Fall from scaffold or over turning fork lift truck

Risk = Hazard x Likelihood of Occurrence

Severity \ Likelihood	1 – Non-Injury	2 Seven-day injury or less	3 Over seven-day injury	4 – Major injury (RIDDOR)	5 – Death
1 – Remote	1	2	3	4	5
2 – Unlikely	2	4	6	8	10
3 – possible	3	6	9	12	15
4 – Likely	4	8	12	16	20
5 – Certain or near certain	5	10	15	20	25

The Risk Assessment Matrix is based on a system used by safety practitioners and published in HSE guide HSG65 Successful Health and Safety Management. Risk is the product of Hazard (potential to cause harm) and Likelihood of an incident. Risk ratings of low, moderate, significant, severe and catastrophic indicate the priority for action.

Suggested Target Dates for resolution of hazards are shown below.

Catastrophic risk	Immediate action (20 or 25)
Severe risk	Within one month (12, 15 or 16)
Significant risk	Within two months (5, 6, 8, 9 or 10)
Moderate risk	Within three months (3 or 4)
Low risk	Within four months (1 or 2)

Some items may be a low risk, for example a basic notice missing or a written assessment not completed, but it may be a legal requirement to have these. Where a **Legal Requirement** has not been met, a statement is also made “This is a legal requirement”.

The five steps to risk assessment are;

1. Look for the hazards.
2. Decide who might be harmed and how.
3. Evaluate the risks and decide whether existing precautions are adequate or whether more should be done.
4. Record your findings
5. Review your assessment and revise it if necessary.

Risk Management

The principles of sound risk management are applied to all of the School's activities. These follow the system of Risk Identification, Risk Measurement and Risk Control. Suitable insurance is held for employer's liability, public liability and where required professional indemnity.

Safe Systems of Work

Safe systems of work are established for all work activities.

Safety Inspections

We complete routine planned safety inspections of all areas of the premises and correct faults via the Facilities maintenance system. The safety advisor is instructed to assist as required to ensure safety inspections are suitable and sufficient.

Safety Rules

Sensible precautions are encouraged and taken for housekeeping, fire, manual handling, first aid, work equipment and site security, to maintain a low risk of injury to the School's staff and students.

Security

Security is managed by Bouygues Energies and Services including access & physical security, external areas, property, alarms, CCTV, security of people, training, security staffing, information and electronic security, cash handling and vetting of staff for security clearance where required.

Signs – Safety Signs and Signals

Where a safety sign is used and a picture (pictogram) would enhance the safety message, the picture is also used. Examples are the *Running Man Fire Escape* sign and *No Entry* signs.

Site Restrictions

For any projects involving building works, access will be restricted or closed to ensure the safety of all building occupants. Generally hazardous areas will be secured by the use of locked doors to allow only maintenance personnel to gain access.

Smoking, alcohol and drugs

All forms of smoking (cigarettes, cigars, e-cigarettes, vaping or any other) are not permitted inside the buildings and in the internal courtyard and courtyard adjacent to the Glass House. Smoking is only permitted in the dedicated smoking area located at the front of the building, nearby the main entrance.

Smoking is permitted during allowed breaks, away from any combustible or flammable materials and well away from front or rear entrances to prevent smoke being blown back into the building.

Consumption of alcohol whilst on duty is not permitted.

The possession of illegal drugs is not permitted. Being under the influence of alcohol or drugs will affect safety, conduct and work performance and is therefore prohibited.

Stress

We aim to promote an active stress management policy, considering the demands on staff, the control staff have over work, support for staff, relationships (colleagues and managers), role and change. Counselling for work-related stress is available via the occupational health service.

We will follow the HSE advice that “Employers have a legal duty to protect workers from stress at work by doing a risk assessment and acting on it”.

This will be implemented by providing training to managers to carry out a simple risk assessment of their staff using the HSE six Management Standards.

Training and Competency for Tasks

We are committed to providing adequate on-going health and safety training to staff to enable us to operate safely and efficiently. Records of all training are kept in writing. Courses are planned and delivered according to training needs. Courses on offer include safety for new staff, safety awareness, fire, fire marshalling, manual handling, Chemical Safety (COSHH), [personal safety](#), security awareness and bomb threat response.

Induction training is provided for all employees by the Human Resources department and the Health and Safety Manager.

Job specific training is provided by the employee’s direct line manager with input from Human Resources where required.

Jobs requiring special training include use of machines in the Print / Resources Room and in the catering department.

Training records are kept by the Health & Safety Manager with copies provided to Human Resources.

Training is identified, arranged and monitored by the Safety Advisor.

Ventilation and Temperature

All staff are entitled to a flow of fresh air by the provision of a door and opening window in their work place. Where this is not possible, mechanical extract ventilation or similar is provided. The Workplace (Health, Safety & Welfare) Regulations 1992 Approved Code of Practice provides guidance that “the fresh air supply rate should not normally fall below 5 to 8 litres per second, per occupant”. We ensure that adequate air is provided.

Violence

Most work activities are extremely low risk due to the environment provided and the nature of the School’s work. Violence, aggression or threatening behaviour towards the staff are not tolerated from others. The Police will be called should there be any incident.

Where staff need to visit other premises, a risk assessment before the visit will be conducted, where necessary. When going to other institutions, this could be required if there had been reports of mugging or violence in the area or there was a danger such as the need to use an underground public car park or be leaving an isolated region at night.

Waste Management

The waste which we generate is generally non-hazardous. See “Environmental Policy”. See the separate waste management arrangements made with the School’s waste disposal contractor.

Work at Height including Roof work

Roof work and other work at height results in many fatal and serious injuries across the UK every year. There is no “safe” height at which to work. A detailed risk assessment of any work at height would be conducted to proactively identify risk if this became necessary. The Work at Height Regulations 2005 require:

- Organisation, planning and supervision of safe work at height.
- Competent persons to carry out, plan and supervise work at height.
- Risk assessments to be undertaken.

- Risks from work at height to be avoided where possible.
- Measures to be taken to prevent, so far as is reasonably practicable, any person falling a distance liable to cause personal injury.
- Work equipment to be provided to prevent a fall occurring.
- Where the risk of a fall occurring is not eliminated, provision of work equipment to be provided to minimise the distance and consequences or at least the consequences of a fall.
- Workers to be trained and instructed or otherwise protected, to prevent any person falling a distance liable to cause personal injury.

Work Equipment

We ensure that all work equipment is suitable, maintained and restricted to selected personnel where there are specific risks. Suitable information, instruction and training are provided. Dangerous parts of machinery will be guarded. Protection will be provided against specified hazards. Proper controls over operating conditions shall be provided. Stop controls and emergency stop controls shall be provided. All controls will be clearly identified. Effective means for isolating equipment will be provided so that they can be locked off. This hazard is essentially low risk as only general office equipment is provided but this will still be fully managed.

Plant room equipment is managed through a contract with Bouygues Energies and Services.

Working Time

The Working Time Regulations 1998 specify requirements for the maximum weekly working time, length of work at night, health assessments for night workers, pattern of work, record keeping, daily rest breaks and entitlement to annual leave.

The Working Time (Amendment) Regulations 2006 require that senior staff who set their own hours and manage their own time keeping are no longer excluded from the legislation.

The Human Resources department monitors staff working hours to ensure their health and safety.

Work Permits

Maintenance work carried out by contractors is done so using a Permit to Work system.

Workplace (Health, Safety & Welfare) Regulations 1992

We provide a suitable workplace for all staff and interns considering issues such as maintenance, ventilation, temperature, lighting, space, workstations, seating, floors, traffic routes, cleanliness, waste disposal, windows and window cleaning, doors, toilets, washing facilities, drinking water and rest areas.

Young Workers

A “young person” is defined as any person who has not reached the age of eighteen and a “child” is defined as any person who is not over compulsory school age. The supervision of young persons will be arranged and monitored by the Health & Safety Manager.

The School will consider that young persons are likely to be inexperienced, unaware of health and safety risks, and be physically and/or mentally immature.

Where necessary a Young Person risk assessment will be completed including consideration of the workplace layout, their physical or psychological capacity, pace or organisation of work, extremes of temperature, noise or vibration, hazardous substances, machinery or work equipment, lack of training or experience and any tendency to pay inadequate attention to safety.

Training and supervision may be used to manage some of these hazards.