

LEWISHAM COUNCIL

**ANNUAL HEALTH & SAFETY
SCHOOLS AUDIT REPORT
2013/14 ACADEMIC YEAR**



March 2015

**CORPORATE HEALTH & SAFETY TEAM
TOWN HALL CHAMBERS, CATFORD**

1. INTRODUCTION

- 1.1. The Corporate Health and Safety Team (CH&ST) has now completed the Schools Health and Safety (H&S) audit programme for the 2013/14, academic year (September – July). The purpose of the H&S audits is to monitor the H&S arrangements in Community Schools within the Council to assess their suitability and compliance with all H&S legislation, approved codes of practices and guidance.
- 1.2. Two types of audits are administered in schools; full and self-assessment audits. Full audits are carried out by the Schools H&S Adviser and the self-assessment audits are carried out annually by the Head Teacher/Nominee and Chair of Governors, who are asked to assess their own management of H&S using a structured questionnaire. All schools are automatically sent the self-assessment questionnaire for completion. For this academic year the total plan for 11 full audits and 3 follow up audits was delivered. Self-assessment questionnaires were sent to all schools. A similar process for self-assessment auditing is followed for the five Secondary Schools who hold radioactive materials.

2. SCOPE OF THIS REPORT

- 2.1. This report provides a summary of the H&S audit work, key findings and recommendations from the schools H&S audit programme to raise compliance with all necessary legal requirements and good practices.
- 2.2. **Appendices A and B** provide a more detailed breakdown by School to assist them with focusing on and enhancing their existing arrangements for managing H&S.

3. AUDIT PLAN AND APPROACH

- 3.1. The H&S Audit Plan is prepared based on an assessment of all the identified community schools. The assessment considers the six key H&S risk groupings set out in the Council's Statement of Intent. These are: Workplace / Site Related, Job Specific, Chemical & Hazardous Substances, Work Activity & Equipment, Occupational Health & Welfare and Health, and Safety Management.
- 3.2. The objective of the audits is to examine the Schools H&S management arrangements against the Council's British Standard (BS) 18001 H&S management system. The emphasis is placed on the provision of evidence at the audit. All H&S documents are inspected to ensure they are suitable and meet the required standard. The audit also includes a site inspection to identify any obvious hazards and offer advice on appropriate corrective actions.
- 3.3. The audits, where possible, are undertaken with the Head Teacher and or their nominated deputy with a representative from the Facilities Team or Facilities Management (FM) Provider and are concluded with a feedback meeting and the issuing of the audit report and an action plan. The action plan is then returned to the Schools H&S Adviser within a specified timescale for them to track the implementation of recommendations. For 2013/14;
 - A total of 11 full audits were completed and reports, including recommendations and action plans, were sent to relevant persons for action.
 - Two of the three schools revisited to undertake mini audits showed significant improvement. However, there was no change for one school and the assurance

opinion remained the same as the school is still in the process of constructing their H&S policy and procedures.

- A total of 84 self-assessment questionnaires were sent out and 45 (53%) were completed and returned to the Schools H&S Adviser.
- The five secondary schools who have declared that they hold radioactive materials were approached to complete a radiation self-audit and only two of these completed and returned their radiation self-assessments.

4. SUMMARY FINDINGS

Full H&S audits

- 4.1. Based on the findings of each full audit, an opinion, using a four point scale of Excellent, Good, Weak and Poor, on the adequacy of H&S controls in place and compliance with them. These assurances are defined in **Appendix A**. Overall, 76% of the full H&S audits received a positive (Excellent 36% & Good 40%) opinion compared to 74% in the previous year.
- 4.2. A full list of the audits and their opinions by school are provided in **Appendix B**. **Table 1** below shows the summary position by School for 2013/14.

Name of School	Excellent	Good	Weak	Poor
Brent Knoll (Sp)			X	
Brindishe Greene (P)	X			
Childeric (P)	X			
Stillness Junior (P)		X		
Stillness Infant (P)	X			
Beecroft Primary (P)	X			
Coopers Lane (P)		X		
Holbeach (P)			X	
Downderry (P)		X		
Elfrida (P)*				X
Forest Hill Secondary (S)		X		
Edmund Waller (P) Revisit			X	
Deptford Green (S) Revisit		X		
Ashmead (P) Revisit		X		
Total	4	6	3	1
P = Primary School / S = Secondary School / Sp = Special Needs Schools				

* A follow up meeting with the Executive Head Teacher for Elfrida school confirmed that specific H&S documents related to the recommendations from the audit were in place.

- 4.3. On receipt of the H&S audit report the Head Teacher is asked to return a completed action plan to demonstrate that they have understood the recommendations and identified the actions to be completed by whom and by when.

Table 2 below shows the position of H&S action plans completed and returned for 2013/14.

Full H&S Audits	2013/14		
	Audits	Action plan	% returned
Schools	14	2	14%

Self-assessment H&S audits

- 4.4. The self-assessment audits do not record a formal assurance opinion but aim rather to serve as a refresher/reminder for Head Teachers and Governing Bodies of their H&S obligations which they need to be discussing with staff, contractors and partners.

Table 3 below shows the position of completed self-assessment H&S audits received for 2013/14 compared to previous year.

Self H&S Audits	Number of Schools	2013/14		2012/13	
		Returns	% returned	Returns	% returned
Schools	84	45	53%	62	74%

Radiation sources audits

- 4.5. All secondary schools who have declared that they hold radioactive materials were sent the radiation self-audit questionnaires.
- 4.6. **Table 4** below shows the number of self audit radiation questionnaires returned from schools who hold radioactive materials.

Radiation Self Audits	2013/14		
	Number of Schools	Returns	% returned
Schools	5	2	40%

Findings

- 4.7. The summary findings from the Schools 2013/14 H&S audit programme are:
- 36% of full H&S audit reports were issued with a positive (excellent) assurance opinion.
 - 40% of full H&S audit reports were issued with a positive (good) assurance opinion.

- Only 20% of those in receipt of a full audit report completed an action plan to assist with monitoring the implementation of H&S recommendations and to help demonstrate continuous improvement. This falls to 14% if revisits included.
- 53% of schools returned their self-assessments and the findings are generally positive. However, these have to be viewed in the context of “self-assessment” which may present an optimism bias.
- 40% of schools with radiation sources on site returned their radiation self-audits

5. FULL AUDIT AND SELF- ASSESSMENT DETAILED FINDINGS – CROSS SCHOOLS

- 5.1. This section draws out the common themes identified by the CH&ST through the H&S audit work undertaken. To identify whether the general points being made apply to the H&S assessment of a particular school the reader would need to refer to the specific H&S audit for that school.

Workplace/site Related

- 5.2. This area relates to property and statutory maintenance of the schools estate. For example, asbestos, fire, electricity, gas glazing, legionella, swimming pools, educational visits, and Physical Education (PE).

Full Audits

- 5.3. Specific areas of good practice were noted in the management of statutory maintenance, particularly when the school had direct responsibility for their own premises team. The training sessions covering areas of statutory maintenance including asbestos and legionella were very well attended by premises staff. Most schools had trained Educational Visits Coordinators on site which was reflected in the quality of the educational visits risk assessments in place.
- 5.4. Most schools had trained PE Coordinators on site with good arrangements in place for managing the PE activities and equipment.
- 5.5. Common areas identified requiring corrective action were in respect of health and safety signage either not in place or not completed correctly (e.g. fire action notices, cleaning cupboards and boiler houses).

Self-Assessments

- 5.6. The majority of schools who responded to the self-assessment indicated having clear procedures and risk assessments in place to manage site related risks. Fire drills are undertaken regularly and records are retained. Schools have mostly reported undertaking regular site inspections and records retained.

Job Specific

- 5.7. This area relates to operational activities such as the use of computers, lone working, manual / moving handling and violence and aggression, working at height, moving and handling people and noise.

Full Audits

- 5.8. Most schools were well informed of their operational H&S risks and have set up good local H&S arrangements to reduce risks by developing site specific policies, procedures and completing risk assessments for various operational activities.
- 5.9. Training for some job specific operational activities has been very well attended (e.g. working at height, manual handling).
- 5.10. Training for DSE (Display Screen Equipment) Assessors was not delivered due to low attendance numbers.
- 5.11. Audits identified that some schools did not have policies or procedures in place to manage the H&S risks for lone working, violence and aggression, use of computers, manual/moving handling and other specific local operational risks.
- 5.12. The inclusion of pupils with complex behavioural and medical needs into mainstream schools have introduced new risks to both employees and other pupils. Some schools identified the risks of violence and aggression from pupils had increased and a training need identified but many staff had still not received training.

Self-Assessment

- 5.13. The majority of schools reported that Display Screen Equipment (DSE) assessments have been completed. Most schools reported that there are trained assessors on site in manual handling and working at height. Risk assessments and local written procedures in place (lone working, violence and aggression. working at height) to manage operational risks.

Chemical & Hazardous Substances

- 5.14. This relates to batteries, chemical substances, flammable liquids, radiation and waste management.

Full Audits

- 5.15. Some schools manage their own cleaning standards and others have contracted out cleaning. Most schools have good training records for Control Of Substances Hazardous to Health (COSHH). The schools who manage their own cleaning have written procedures and Control Of Substances Hazardous to Health (COSHH) assessments in place to manage the risks associated with the use and storage of chemicals and hazardous substances. Some schools that have contracted out cleaning to contractors, have good documentation from the contractor in regards to training records and copies of there chemical data sheets. Good management of radiation sources and radiation protection supervisor RPO in place in the only secondary school audited.
- 5.16. Specific areas identified as requiring corrective actions were the review of the existing COSHH assessments, procedures and the keeping of COSHH assessments/safety data sheets with the cleaning products.. Some of the schools who have contracted cleaning did not have the necessary documentation and training records of the contractors on site including COSHH information for all chemicals held on site. Chemicals not procured or authorised by the school were discovered in classrooms during some of the school audits. Schools that held petrol or diesel on site did not have H&S procedures or policies in place to manage any associated risks.

Self-Assessment

- 5.17. The majority of schools who responded reported having clear procedures and risk assessments in place to manage the risks of chemicals on site. Most schools reported having trained COSHH assessors on site.

Work Activity & Equipment

- 5.18. This area relates to imported risks to the Council through the purchase of goods and services, managing contractors, use of vehicles / driving, and work equipment.

Full Audits

- 5.19. Schools that had lifts on site were well managed with all statutory requirements including regular inspections undertaken. Most schools are aware of the Councils procurement process for purchase of goods and services. A few schools have robust arrangements in place to manage and monitor the activities of contractors on site. Some schools that have their own vehicles (mini buses) on site appear to manage them well. They have arrangements in place to monitor licenses, insurance, training etc.. of the drivers and the maintenance and regulatory checks of the vehicles.
- 5.20. However, there are schools who allow staff to drive as part of their work activities and do not undertake any formal checks of licenses and insurance. Some schools allow vehicles to move around their site during designated times without risk assessments undertaken to manage any associated risks. Some schools are not clear on their H&S roles and responsibilities when managing contractors, particularly in schools with facilities Management (FM) Providers. There appears to be a general lack of knowledge in how the school should manage and monitor the operational activities of the contractors. Some schools are not clear on how imported risks such as sporting providers or lettings must be managed and any H&S risks communicated. This also includes any activities undertaken by Parents & Teachers Associations. This would indicate the need for training in managing and monitoring contractors.

Self-Assessment

- 5.21. Most schools have risk assessments for work equipment used. The majority of schools who responded indicated that they have policies and procedures in place for managing contractors.

Occupational Health & Welfare

- 5.22. This relates to work-related stress, first aid, alcohol and drugs, administration of medication, communicable and infectious diseases.

Full Audits

- 5.23. The management of work related stress was good in most schools. Some schools bought in external Wellbeing providers while some managed it at a local level (e.g., mentoring, well being days / activities). Nearly all schools have more than sufficient numbers of trained first aiders on site. Some schools have good procedures in place for managing the administration of medications, with strict protocols in place for handling certain medications.

- 5.24. However, some schools who manage work related stress informally have no documents to evident compliance, for example; open door policy, discussing issues at team meetings etc.. First aid provision is generally very well managed but some schools are not aware of the requirement for early years first aid provision. Most schools appear not to recognise the use of alcohol and drugs as areas of concern and there are no systems in place of managing such risks. Although schools generally manage medications adequately there were a couple of occasions where out of date pupils medications were identified in the school.

Self-Assessment

- 5.25. Most schools indicated that they have procedures and risk assessments in place for first aid, administration of medications and communicable diseases. Some schools reported having policy and procedures in place to manage work related stress. Some schools reported the need to undertake a stress audit..

Safety Management

- 5.26. This relates to H&S objectives, consultation and communication, training, incident reporting, risk assessment, local procedures and roles and responsibilities.

Full Audit

- 5.27. Schools who performed well had good written local procedures, records of H&S training, operational risk assessments of good quality and a good system for reporting and investigating work-related incidents. The roles and responsibilities of key persons in the school such as Head Teachers, Senior Leadership Team, Governing Body, Premises Officer, first aiders and fire marshals were clearly defined in their arrangements for managing H&S. Health and safety training is undertaken regularly by most schools and good training records are held. The majority of schools identified their H&S objectives in a statement of intent. Procedures and policies on consultation and communication on H&S issues including trade union involvement was good in most schools.
- 5.28. However, some schools did not have good written policies, local procedures or risk assessments in place. Some schools recorded accidents and incidents locally but did not report them using the online reporting system preventing wider trends / lessons being shared. The statement of intent were not signed and dated by the Chair of Governors in some cases. Also the H&S roles and responsibilities between the school and FM Providers/contractors were not always clearly defined. No evidence was available in some schools on how H&S issues were raised, consulted on and communicated.

Self-Assessment

- 5.29. Schools who responded reported having specific H&S objectives such as the review of risk assessments and reducing accidents and incidents. They have defined roles and responsibilities within the team (e.g. first aiders, fire marshals etc..) and many reported having trained risk and DSE assessors. Health and safety training has been well attended.
- 5.30. Appendix B provides a summary of recommendations as well as the return date of the action plans for Schools audited in 2013/14.

6. RECOMMENDATIONS

- 6.1. There were some good practices noted from the schools full audits. However, some common areas where improvements are needed were noted. They are:

1. Management of Medications

Most schools have policies and procedures in place to manage the risks associated with administering medications. However during the audit, many schools were found not to be managing medications locally on site. Some were not adequately labelled, stored correctly and some medications were found to be out of date. Staff must be delegated with the responsibility for ensuring medications are labelled correctly and stored in secure areas. A robust regime should be implemented to ensure out of date medications are returned to parents for disposal.

2. Local Policies / Procedures / Risk assessments

Schools must develop local policies, procedures and risk assessments for all the operational risks and activities on their site, including off-site visits. All H&S policies, procedures and risk assessments once developed must be communicated to all relevant persons. In the schools H&S policy document any staff / contractors delegated with H&S responsibilities must be clearly defined and requisite training undertaken (e.g. risk assessors, fire marshalls, first aiders, educational visit coordinators and radiation protection supervisors).

The Council's health and safety policy, risk control and management procedures (available on the external server) are available for use as a framework to develop local school health and safety procedures.

3. Vehicles & Driving For Work

Most of the schools with their own mini buses have procedures and policies in place to manage all the associated operational risks. However some schools permit their staff to drive to pupils homes to undertake pre-assessment interviews for new pupils. If staff use their own vehicle to undertake their duties, checks should be made to ensure they have a valid driving licenses and adequate insurance. A suitable risk assessment should be undertaken prior to any visits and information should be sought from any external agencies (e.g. a health visitor, nursery where child previously attended).

4. Management of Contractors

There are often issues with managing FM providers/contractors in schools. Therefore, schools who are working in partnership with other service providers must ensure that a clear H&S standard is set and agreed between the two parties. The standard set must define roles and responsibilities and Key Performance Indicators (KPI) identified. The KPIs should be used to assess and monitor the H&S competency of the contractor. The monitoring must take place at a regular meetings and for substantial projects an annual audit of the contractors H&S management system carried out. Records of all monitoring and H&S discussions must be kept. A similar standard should be set for sub-contractors who are used by the contractors/FM Providers and the school must request evidence of compliance from the contractors/FM Providers. Schools should request information from the contractor before any works commence, including; risk assessments, safe systems of work,

relevant training records, insurance certificates and any other relevant H&S documentation.

5. Storage of Hazardous & Combustible Materials

Some schools were found during the audit process to use the boiler house and cupboards as areas to store excessive amounts of combustible / hazardous materials. This creates a significant fire risk to the school and must be avoided at all times. A strict inspection regime should be implemented to ensure hazardous or combustible materials are not stored in these areas and suitable storage is provided.

7. CONCLUSIONS

- 7.1. In conclusion, 76% of schools received a positive H&S assurance opinion, demonstrating that they have set up and maintain good H&S standards. These schools have engaged with and trained their staff on various H&S matters, completed risk assessments for their operational activities, and developed policies and procedures for managing local risks.
- 7.2. For some schools, particularly those with FM providers, there is a need to improve the working relationships with contractors to ensure H&S roles are clearly defined and that H&S documents for activities managed by contractors are made available to schools.
- 7.3. With the introduction of pupils with emotional/ behavioural and medical needs into mainstream settings schools must ensure that they have policies and procedures in place to manage the associated risks. Good communication / information from other childhood settings and organisations must be considered when accepting the children, to ensure all the risks are identified and adequately controlled.
- 7.4. Even though only a minority of schools audited returned completed action plans for the H&S recommendations made, Schools must continue to review their own H&S arrangements and implement these recommendations.

Appendix A – Definition of Full H&S Audit assurance opinions and list of audits by Directorate

Level of Assurance	Adequacy of H&S arrangements in place	Compliance with H&S arrangements
Excellent	Robust framework of controls matched to risk ensures H&S objectives are likely to be achieved.	H&S controls are applied continuously with minor lapses.
Good	Sufficient framework or key controls for H&S objectives to be achieved but could be stronger.	H&S controls are applied with some lapses.
Weak	Risk of H&S objectives not being achieved due to the absence of key internal controls.	Significant breakdown in the management & application of H&S controls.
Poor	System of control not in place. Absence of basic H&S controls resulting in inability to meet objectives.	Absence of compliance with fundamental H&S controls.

School	Adequacy of H&S arrangements	Compliance with H&S arrangements	Overall Opinion
Full Audits			
Brent Knoll (Sp)	WEAK	WEAK	WEAK
Brindishe Greene (P)	EXCELLENT	EXCELLENT	EXCELLENT
Childeric (P)	EXCELLENT	EXCELLENT	EXCELLENT
Stillness Junior (P)	GOOD	WEAK	GOOD
Stillness Infant (P)	GOOD	EXCELLENT	EXCELLENT
Beecroft Primary (P)	GOOD	EXCELLENT	EXCELLENT
Coopers Lane (P)	GOOD	WEAK	GOOD
Holbeach (P)	WEAK	GOOD	WEAK

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School	Adequacy of H&S arrangements	Compliance with H&S arrangements	Overall Opinion
Downderry (P)	EXCELLENT	GOOD	GOOD
Elfrida (P)	WEAK	WEAK	WEAK
Forest Hill Secondary (S)	GOOD	GOOD	GOOD
Revisits			
Edmund Waller (P)	**		WEAK
Deptford Green (S)	POOR (Previous)	POOR (Previous)	GOOD
Ashmead (P)	**		GOOD

** Both these school were audited using the previous different audit method so opinions are not comparable

Appendix B – CYP Schools H&S audit results 2012/13

School	Report Date	Action Plan Due Date	Summary of Recommendations
Beecroft Primary (P)	April 2014	July 2014	<ul style="list-style-type: none"> • The development of operational risk assessments. • H&S refresher training for premises and school staff. • Review and update educational visits risk assessments.
Brent Knoll (Sp)	November 2013	April 2014	<ul style="list-style-type: none"> • The development of risk assessments for all operational activities. • Review of first aid provision to ensure the requirements for paediatric first aid is included. • A strict inspection regime is in place to ensure risks are controlled particularly in the science rooms. • Removal of all combustible and electrical equipment from the PE store.
Brindishe Greene (P)	January 2014	April 2014	<ul style="list-style-type: none"> • Review the H&S policy document to include all operational risks including flammable and driving for work. • Review of all areas that contain hazardous chemicals and ensure appropriate warning signage is in place.
Childeric (P)	December 2013	April 2014	<ul style="list-style-type: none"> • The development of H&S policy document to include all operational risks. • The completion of risk assessments for all operational activities. • Review all fire action notices to ensure details of assembly points are in place.
Coopers Lane (P)	August 2014	October 2014	<ul style="list-style-type: none"> • Review the H&S policy document to include all operational risks. Development of local H&S procedures and risk assessments. DSE self assessments to be undertaken by all computer users. Administration of medication procedure to be developed and regime implemented to ensure all medications held on site are in date and adequately labelled.
Downderry (P)	August 2014	November 2014	<ul style="list-style-type: none"> • Review of the H&S policy document to include all operational risks. Outstanding procedures and risk assessments for operational activities / areas must be developed. A procedure for management of the swimming pool must be developed and must include normal and emergency operating arrangements. A swimming pool risk

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School	Report Date	Action Plan Due Date	Summary of Recommendations
			assessment must be undertaken.
Forest Hill Secondary (S)	July 2014	October 2014	<ul style="list-style-type: none"> Review the H&S policy document to ensure it includes arrangements for all the operational H&S risks on site. To ensure the FM provider have a system or process in place for managing and monitoring the activities of sub-contractors. To ensure sufficient numbers of staff are trained in the use of the fire evacuation equipment. Review the current First Aid provision to ensure there are sufficient numbers of trained staff.
Holbeach (P)	April 2014	July 2014	<ul style="list-style-type: none"> Review the H&S policy document to include all operational risks. Development of local H&S procedures and risk assessments. To review medications procedure to ensure strict arrangements are in place to manage medications on site including to disposal of out of date medicines.
Stillness Infant (P)	April 2014	October 2014	<ul style="list-style-type: none"> Outstanding risk assessments for all operational site activities must be developed. Procedure developed for the use of flammable liquids held on site. All recommendations noted on the water hygiene must be addressed and an action plan developed. Review of the current educational visits risk assessments to include emergency arrangements .
Stillness Junior (P)	April 2014	July 2014	<ul style="list-style-type: none"> The development of H&S policy document to include all operational risks. The completion of risk assessments for all operational activities. The boiler house must be cleared of all combustible materials and trip hazards removed from staircase. All recommendations noted on the water hygiene must be addressed and an action plan developed. Review all fire action notices to ensure details of assembly points are in place. Review of all areas that contain hazardous chemicals/ substances to ensure appropriate warning signage is in place.
Edmund Waller Revisit	February 2012	July 2012	<ul style="list-style-type: none"> The H&S policy document must be developed to include arrangements to manage all operational risks. H&S roles and responsibilities must be clearly defined.

School	Report Date	Action Plan Due Date	Summary of Recommendations
			<ul style="list-style-type: none"> • The completion of risk assessments and some operational procedures must be undertaken. • Ensure that all staff that have been delegated with H&S responsibilities are suitably trained.
Deptford Green Revisit	June 2013	December 2013	<ul style="list-style-type: none"> • To develop H&S policy to include defined roles and responsibilities with FM provider. • To review all risk assessments to ensure all hazards have been identified and suitable control measures implemented.
Ashmead Revisit	February 2013	December 2013	<ul style="list-style-type: none"> • The policy document must be reviewed to include arrangements for all operational risks. • Risk assessments for all operational activities / site must be undertaken.