Harmondsworth Primary School

Health and Safety Arrangements and Procedures Manual

Prepared By	**Daniel Middleton**
Issue Date	**30/01/2026**
Next Planned Review Date	**January 2027**

CONTENTS

1.	**Health and Safety Statement of Intent**	**3**
2.	**Purpose and Scope of the Health and Safety Arrangements and Procedures Manual**	**5**
3.	**Interface with London Borough of Hillingdon Health and Safety Systems**	**6**
4.	**Roles, Responsibilities, and Governance**	**10**
5.	**Appointment and Role of the Competent Person**	**14**
6.	**Monitoring, Inspection, and Assurance**	**15**
7.	**Risk Register and Action Management**	**18**
8.	**Risk Assessment Management and Control**	**22**
9.	**Fire Safety Arrangements**	**26**
10.	**COSHH and Hazardous Substances Management**	**30**
11.	**Planned Preventative Maintenance and Statutory Compliance Oversight**	**34**
12.	**Training, Competence, and Information**	**38**
13.	**Accident, Incident, and Near Miss Reporting and Investigation**	**41**
14.	**Review, Audit, and Continuous Improvement**	**44**

1. Health and Safety Statement of Intent

Harmondsworth Primary School is committed to ensuring, so far as is reasonably practicable, the health, safety, and welfare of all persons who may be affected by its activities. This includes pupils, staff, visitors, contractors, and any other persons accessing or working on the premises.

The Governing Body accepts ultimate responsibility for health and safety governance and for ensuring that effective arrangements are in place to manage risk. The Headteacher is responsible for the day to day leadership and implementation of these arrangements on behalf of the Governing Body.

To ensure that health and safety duties are discharged effectively, proportionately, and in a manner that remains suitable and sufficient over time, the school has appointed Adeptify Ltd as its external competent person for health and safety. Adeptify provides independent professional oversight, monitoring, challenge, and assurance across the school's health and safety management system.

Health and safety at Harmondsworth Primary School is not treated as a paper-based or reactive exercise. It is managed through an active system that includes structured risk identification, regular inspection and observation, maintenance of a live risk register, monitoring of actions to completion, and escalation where controls are inadequate or progress is not achieved.

The school is committed to ensuring that health and safety is given equal priority alongside educational and operational objectives. Adequate resources will be made available to implement agreed control measures, address identified risks, and maintain compliance with required standards.

All staff are expected to cooperate with the school's health and safety arrangements, follow established procedures, and engage with monitoring and assurance activity. Health and safety is a shared responsibility, and effective control relies on clear roles, accountability, and professional oversight.

This Health and Safety Arrangements and Procedures Manual forms part of the school's wider Health and Safety Management System. It is endorsed by both the Governing Body and the Headteacher and sets out how responsibilities are allocated, how risks are managed in practice, and how assurance is provided through the appointed competent person. The system will be reviewed regularly to ensure it remains effective, proportionate, and aligned with the school's activities and risk profile.

Signed on behalf of the Governing Body	
Name:	**Hardip Lawana**
Role:	Chair of Governors
Date:	**January 2026**
Signed on behalf of the School	
Name:	**Eleesa Dowding**
Role:	Headteacher
Date:	**January 2026**

2. Purpose and Scope of the Health and Safety Arrangements and Procedures Manual

This Health and Safety Arrangements and Procedures Manual sets out how Harmondsworth Primary School manages health and safety in practice in order to meet its legal duties, local authority expectations, and internal governance requirements.

The purpose of this manual is to describe the arrangements through which the Governing Body and Headteacher ensure that health and safety risks are identified, controlled, monitored, and reviewed on an ongoing basis. It is not intended to operate as a standalone compliance document, nor does it replace the need for active oversight and professional assurance.

This manual has been developed to align with the London Borough of Hillingdon Health and Safety Management System framework and reflects the school's duty to maintain a structured, auditable, and effective system of risk management. It also reflects the school's decision to discharge key elements of that system through the appointment of an external competent person.

Adeptify Ltd is appointed as the school's competent person for health and safety. Adeptify provides professional oversight, monitoring, challenge, and assurance across the school's health and safety arrangements. This manual therefore operates alongside Adeptify's Operating Manual and Operational Delivery Manual, which define how competent person activities are delivered in practice.

The scope of this manual includes:

- Governance arrangements and allocation of responsibilities
- Day to day health and safety arrangements within the school
- Interfaces between school leadership and the competent person
- Monitoring, inspection, and assurance mechanisms
- Management of risk assessments, incidents, and actions

This manual does not assign legal responsibility away from the Governing Body or Headteacher. Responsibility for health and safety remains with the school. The role of Adeptify is to support

the school by providing independent oversight, professional judgement, and structured assurance to ensure that arrangements remain suitable and sufficient.

All staff, contractors, and visitors are expected to comply with the arrangements set out in this manual and to cooperate with monitoring and assurance activity undertaken by or on behalf of the appointed competent person.

This manual will be reviewed periodically to ensure it remains aligned with the school's activities, risk profile, and the competent person delivery model in place.

3. Interface with London Borough of Hillingdon Health and Safety Systems

Harmondsworth Primary School operates within the health and safety framework established by the London Borough of Hillingdon. This includes adherence to local authority policies, reporting expectations, and governance level systems issued to maintained schools.

The London Borough of Hillingdon Health and Safety Management System sets out a common framework and minimum expectations across maintained schools. It does not, in itself, provide site specific risk management, inspection, monitoring, or professional assurance.

This Health and Safety Arrangements and Procedures Manual defines how Harmondsworth Primary School discharges those expectations in practice

Where local authority documentation uses broad or collective terms, this manual provides the school specific interpretation of roles, responsibilities, and controls. This ensures that responsibility is exercised through defined governance, leadership, and competent person arrangements rather than assumed or implied by generic wording.

The school's health and safety management system therefore operates as follows:

• The London Borough of Hillingdon framework defines expectations and governance principles

• This manual defines how those expectations are implemented, monitored, and assured at site level

• Adeptify Ltd provides independent professional oversight to support and challenge those arrangements

The adoption of local authority health and safety documentation does not remove the requirement for active risk management, nor does it replace the need for independent competent person oversight.

Where any ambiguity or conflict is identified between local authority documentation and site arrangements, this will be reviewed and resolved through the school's governance structure, informed by the professional judgement of the appointed competent person.

This approach ensures consistency with local authority expectations while maintaining clear accountability, operational control, and evidence-based assurance at school level.

Purpose of LBH Systems

LBH health and safety systems and documentation are used to:

• Define roles and responsibilities at governance level

• Set minimum expectations for schools

• Support reporting and oversight by the local authority

• Provide a consistent framework across maintained schools

They do not provide day to day risk management, inspection, or assurance.

Role of the Competent Person Within the LBH Framework

Adeptify Ltd is appointed by the school as its competent person for health and safety.

Within the LBH framework, Adeptify:

• Provides active, site specific oversight and assurance

• Translates governance expectations into practical control

• Identifies and manages risk through inspection, observation, and review

• Maintains the Risk Register and monitors actions to closure

• Escalates unmanaged or persistent risks

The existence of LBH systems does not reduce or displace the competent person role.

Avoidance of Duplication and Role Confusion

To avoid duplication, confusion, or false assurance:

• LBH systems are not treated as the primary risk management tool

• Health and safety is not managed solely through uploads or returns

• Adeptify controlled systems provide the operational evidence base

• Information may be drawn from Adeptify systems to support LBH reporting where required

This ensures consistency without parallel systems.

Use of LBH Documentation and Guidance

Where LBH issues policies, guidance, or documentation:

• These are reviewed by Adeptify for relevance and applicability

• Local arrangements are aligned where appropriate

• Conflicts or ambiguities are identified and resolved

Unreviewed or unmanaged documentation is not introduced into the school's system.

Assurance and Accountability

Assurance to the Governing Body and Headteacher is provided through:

• Adeptify's monitoring and reporting

• The Risk Register

• Escalation and follow through mechanisms

LBH systems support governance visibility but do not provide assurance of control in practice.

Escalation and External Engagement

Where significant health and safety concerns arise that require external engagement, this is managed through the school's governance arrangements, informed by the competent person's professional judgement and evidence.

4. Roles, Responsibilities, and Governance

Effective health and safety management at Harmondsworth Primary School relies on clear governance, defined accountability, and independent professional assurance.

Health and safety responsibility cannot be transferred outside the school. It must, however, be structured, supported, and exercised in a way that is proportionate, defensible, and properly controlled.

Health and safety governance at Harmondsworth Primary School operates across three distinct levels:

• Strategic governance and accountability

• Operational leadership and management

• Independent professional oversight and assurance

Each level has a defined purpose. None operate in isolation.

Governing Body	The Governing Body holds ultimate responsibility for health and safety governance at Harmondsworth Primary School. This responsibility relates to oversight, assurance, and the provision of suitable arrangements. It does not require governors to manage risks personally or to act as operational decision makers. The Governing Body is responsible for ensuring that: • Suitable and sufficient health and safety arrangements are in place • Adequate resources are provided to manage identified risks • Competent professional advice and oversight are secured • Health and safety performance is monitored and challenged • Escalated risks and control failures are addressed

	The Governing Body discharges part of this responsibility through the formal appointment of Adeptify Ltd as the school's external competent person for health and safety. This appointment provides independent professional oversight, challenge, and assurance. Governors act in a strategic governance capacity. They do not act as the competent person and do not assume day to day operational control of health and safety activities.
Headteacher	The Headteacher is responsible for the day-to-day leadership and management of health and safety on behalf of the Governing Body. This includes responsibility for ensuring that: • The arrangements set out in this manual are implemented in practice • Staff cooperate with health and safety procedures and controls • Adeptify Ltd is provided with access, information, and engagement required to deliver the competent person role • Actions arising from inspections, risk assessments, and incidents are progressed • Issues that cannot be resolved at operational level are escalated appropriately The Headteacher does not act as the competent person. Independent professional judgement and assurance are provided through Adeptify Ltd.
Senior Leadership Team	Members of the Senior Leadership Team and other nominated managers support the implementation of health and safety

and School Management	arrangements within their areas of responsibility. This includes: • Implementing agreed control measures • Monitoring day to day compliance • Reporting hazards, incidents, and emerging risks • Supporting staff understanding and adherence They are not responsible for assuring the adequacy of the health and safety management system. Assurance is provided independently through the competent person.
Staff	All staff are expected to take reasonable care of their own health and safety and that of others who may be affected by their actions. Staff are required to: • Follow health and safety procedures and instructions • Use equipment and systems as intended • Report hazards, defects, incidents, and near misses • Cooperate with monitoring and inspection activity • Engage with training and instruction provided Failure to cooperate undermines the effectiveness of the system and will be addressed through management processes.
Insurance and Liability Position	Health and safety related claims arising from the activities of Harmondsworth Primary School are managed through the school's established insurance arrangements. The school is covered by the London Borough of Hillingdon insurance scheme, claims are managed on the school's behalf

	through the local authority's appointed insurers. The existence of insurance does not remove the requirement to manage risk. It provides financial protection where incidents occur despite suitable and sufficient control. Governors act collectively in a strategic governance capacity. They are not expected to manage health and safety risk personally or to act as operational decision makers. The purpose of the school's health and safety management system, including the appointment of an external competent person, is to demonstrate due diligence through active risk identification, control, monitoring, and escalation so far as is reasonably practicable. This arrangement reflects the Governing Body's role as a collective governance body rather than as individual duty holders

5. Appointment and Role of the Competent Person

Harmondsworth Primary School has formally appointed Adeptify Ltd as its competent person for health and safety.

Adeptify's role is to provide independent professional oversight, monitoring, challenge, and assurance. This includes, but is not limited to:

• Risk led inspection and observation

• Review of risk assessments and control measures

• Maintenance and oversight of the Risk Register

• Monitoring of actions and verification of completion

• Review of incidents and trends

• Escalation of unmanaged or persistent risks

Adeptify does not assume legal responsibility from the Governing Body or Headteacher. The competent person role exists to ensure that those with responsibility are properly supported, challenged, and assured.

Governance, Challenge, and Escalation

Where Adeptify identifies that controls are inadequate, actions are not progressing, or risks remain unmanaged, these issues will be escalated through defined channels.

Escalation may include:

• Formal reporting to the Headteacher

• Referral to the Governing Body

• Identification of urgent or high risk matters requiring immediate attention

Unmanaged risk will not be normalised or absorbed.

Cooperation and Access

For the system to function effectively, Adeptify must be provided with reasonable access to:

• Relevant areas of the site

• Key staff and leadership

• Records, reports, and documentation

• Information relating to incidents, changes, and planned activities

Withholding access or information compromises assurance and will be treated as a governance concern.

6. Monitoring, Inspection, and Assurance

Health and safety at Harmondsworth Primary School is monitored through an active and structured process designed to identify risk, test the effectiveness of controls, and provide ongoing assurance to leadership and governors.

Monitoring is not limited to confirming that documentation exists. It is focused on verifying that arrangements operate effectively in practice and remain suitable and sufficient.

Monitoring Framework

Monitoring activity operates at two levels:

• Day to day operational monitoring by school leadership and staff

• Independent professional monitoring and assurance delivered through the appointed competent person

nal monitoring and assurance delivered through the appointed competent person

Both levels are required. Operational monitoring alone does not provide sufficient assurance.

Role of the Competent Person in Monitoring

Adeptify Ltd, as the school's appointed competent person, leads structured monitoring and inspection activity.

This includes:

• Risk led site inspections

• Observation of activities, supervision, and behaviours

• Review of compliance against documented arrangements

• Verification that control measures are implemented and effective

• Identification of drift, unsafe norms, or control failure

Inspection activity is proportionate to risk and informed by previous findings, incidents, changes, and emerging concerns. It is not a tick box exercise.

Inspection Approach

Inspections carried out by the competent person focus on:

• Physical conditions of the premises

• Access and egress routes

• Fire safety controls

• High risk activities and areas

• Behaviour and supervision practices

• Contractor activity

• Previously identified risks and actions

Recording and Follow Up

Findings arising from inspections and monitoring are formally recorded.

Where issues affect health and safety:

• Risks are logged to the Risk Register

• Actions are defined with ownership and timescales

• Progress is monitored

• Closure is verified before sign off

Issues are not closed based on verbal assurance alone.

Assurance to Leadership and Governance

The monitoring and inspection process provides structured assurance to the Headteacher and Governing Body.

Assurance is provided through:

• Regular reporting

• Review of Risk Register status

• Identification of trends or recurring issues

• Escalation of unmanaged or persistent risks

This assurance supports informed decision making and governance challenge.

Escalation of Concerns

Where monitoring identifies:

• Immediate or significant risk

• Failure to implement agreed controls

• Repeated non-compliance

• Insufficient resourcing

The issue will be escalated through defined channels. Adeptify will not normalise or absorb unmanaged risk.

Cooperation with Monitoring Activity

All staff and managers are expected to cooperate with monitoring and inspection activity undertaken by or on behalf of the competent person.

Failure to engage, restrict access, or delay action undermines the effectiveness of the system and will be treated as a governance issue.

7. Risk Register and Action Management

Harmondsworth Primary School manages health and safety risk through the use of a live Risk Register. The Risk Register is the primary tool used to identify, prioritise, monitor, and control health and safety risks across the school.

Risk is not managed through isolated documents or informal tracking. All significant health and safety risks are captured, monitored, and reviewed through the Risk Register.

Purpose of the Risk Register

The Risk Register provides:

• A consolidated view of health and safety risk across the site

• A structured method for prioritising action

• A mechanism for monitoring progress over time

• An auditable record of decision making and control

• A basis for leadership and governor assurance

It ensures that risks are not lost, normalised, or managed in isolation.

Oversight and Control of the Risk Register

The Risk Register is maintained and overseen by Adeptify Ltd in its role as the school's appointed competent person.

Adeptify is responsible for:

• Identifying risks through inspection, observation, review, and incident analysis

• Ensuring risks are clearly described and specific to the school

• Agreeing appropriate control measures and actions

• Monitoring progress against agreed actions

• Verifying completion and effectiveness before closure

• Escalating unmanaged or persistent risks

The school is responsible for implementing agreed control measures and actions within the timescales set.

What Must Be Recorded

The following must be recorded on the Risk Register as a minimum:

• Risks where existing controls are inadequate

• Defects identified through inspection or servicing

• Actions arising from incidents or near misses

• Repeated minor issues indicating systemic failure

• Delays or failures in statutory inspections affecting safety

• Fire safety risks and evacuation issues

• Training or competence gaps

Trivial housekeeping observations may be reported separately, but anything affecting safety must be formally logged.

Action Management

Each Risk Register entry must include:

• A clear description of the risk

• Who may be harmed and how

• Existing controls

• Required actions

• Responsible person or role

• Timescale for completion

Actions must be specific and achievable. Vague or open ended actions are not acceptable.

Monitoring and Review

At each competent person visit or review, Adeptify will:

• Review all open risks

• Check progress against agreed actions

• Challenge delays or inadequate responses

• Update risk status based on current conditions

Risks remain open until controls are verified as effective.

Verification and Closure

Actions are not closed based on assumption or assurance alone.

Before closure, Adeptify will verify that:

• The action has been completed

• The control is in place

• The control operates effectively in practice

Where verification cannot be achieved, the risk remains open.

Escalation

Where risks remain unmanaged, actions are repeatedly delayed, or controls are not implemented effectively, the issue will be escalated to the Headteacher and, where appropriate, the Governing Body.

Unmanaged risk will not be absorbed or normalised.

8. Risk Assessment Management and Control

Risk assessments are a core control measure within the school's health and safety management system. They are used to identify hazards, define suitable and sufficient control measures, and inform how activities are carried out in practice.

Risk assessments do not operate in isolation. They form part of an integrated system that includes inspection, observation, incident review, and active monitoring through the Risk Register.

Ownership and Oversight

All health and safety risk assessments used by the school operate under the oversight of the appointed competent person.

Adeptify Ltd is responsible for:

- Ensuring risk assessments are suitable and sufficient
- Ensuring assessments are specific to the school, activity, and environment
- Reviewing assessments for quality, relevance, and effectiveness
- Challenging assessments that do not reflect practice
- Ensuring assessments remain current and appropriate

Risk assessments may be completed with input from school staff, but quality control and assurance sit with the competent person.

Scope of Risk Assessments

The school maintains a structured library of risk assessments, which may include:

• General premises risk assessments

• Activity based risk assessments

• Curriculum specific risk assessments

• Fire related risk assessments

• COSHH assessments

• Personal and individual risk assessments

The scope of assessments is proportionate to risk and reflects the school's activities, pupil profile, staffing arrangements, and site layout.

Use of Third Party or Unauthorised Assessments

The use of parallel or unauthorised risk assessments undermines assurance.

The school must not:

• Introduce third party templates without review

• Maintain duplicate assessments covering the same activity

• Amend risk assessments independently without competent person oversight

Where external documents are proposed, they must be reviewed and either formally integrated or withdrawn.

Review and Update of Risk Assessments

Risk assessments are reviewed:

• At least annually

• Following incidents or near misses

• Following significant change to activities, staffing, layout, or pupil needs

• Where inspections or observations identify control failure

Reviews are planned across the year to avoid superficial bulk updates.

Testing Assessments Against Practice

Risk assessments must reflect how activities actually take place.

Adeptify will test assessments through:

• Observation of activities and supervision

• Inspection of environments and equipment

• Discussion with staff

• Review of incidents and near misses

Where practice does not align with documented controls, either practice must change or the assessment must be amended.

Link to the Risk Register

Where a risk assessment identifies inadequate controls, implementation failure, or increased risk:

• The issue is logged to the Risk Register

• Actions are defined and tracked

• Verification is required before closure

Risk assessments and the Risk Register operate as a single system.

Communication and Implementation

The school is responsible for ensuring that:

• Relevant staff are informed of assessment findings

• Controls are implemented in practice

• Training or instruction is provided where required

Adeptify provides assurance that this communication and implementation are effective.

Escalation

Where risk assessments are repeatedly ignored, cannot be implemented, or are resisted, the issue will be escalated through governance channels.

Risk assessments that do not drive practice are treated as ineffective controls.

9. Fire Safety Arrangements

Fire safety at Harmondsworth Primary School is managed as a critical life safety function. Arrangements are designed to prevent fire, protect occupants, support safe evacuation, and provide assurance that controls remain effective in practice.

Fire safety is not treated as a periodic compliance exercise. It is managed through continuous oversight, monitoring, and review

9.1 Fire Safety Governance

The Governing Body and Headteacher retain responsibility for fire safety within the school.

Adeptify Ltd, as the appointed competent person, provides independent professional oversight, challenge, and assurance to ensure that fire safety arrangements remain suitable, sufficient, and proportionate to risk.

9.2 Fire Risk Assessment Management

The school maintains a current, site specific fire risk assessment.

Adeptify is responsible for:

- Reviewing the fire risk assessment for suitability and sufficiency
- Ensuring significant findings reflect actual site conditions
- Ensuring recommendations are proportionate and prioritised
- Reviewing the assessment following change, incident, or inspection findings

Fire risk assessments are reviewed at least annually and sooner where circumstances change.

Parallel or unmanaged fire risk assessments are not permitted.

9.3 Fire Detection, Alarm, and Warning Systems

Fire detection and alarm systems are subject to routine inspection, testing, and servicing by competent contractors.

Adeptify provides oversight by:

• Reviewing inspection and servicing reports

• Identifying defects, limitations, or repeat faults

• Ensuring actions arising from reports are logged and tracked

• Escalating where defects remain unresolved

Adeptify does not carry out system testing unless explicitly authorised and competent to do so.

9.4 Emergency Lighting and Firefighting Equipment

Emergency lighting and firefighting equipment are maintained through planned inspection and servicing regimes.

Adeptify reviews:

• Test and inspection records

• Defects affecting escape routes or firefighting provision

• Repeated failures or advisory observations

Defects affecting life safety are treated as high priority and escalated accordingly.

9.5 Fire Doors and Compartmentation

Fire doors and compartmentation are critical controls.

Adeptify provides oversight through:

• Observation of fire door condition and use

• Review of inspection reports

• Identification of wedging, damage, or control failure

• Logging and tracking of defects through the Risk Register

Where fire doors are compromised, immediate action is required.

9.6 Evacuation and Emergency Arrangements

Evacuation procedures are documented, communicated, and tested.

Adeptify reviews:

• Evacuation arrangements for clarity and practicality

• Outcomes of fire drills

• Issues arising during evacuations

• Assisted evacuation arrangements where required

Learning from drills and incidents is captured and tracked.

9.7 Fire Drills and Incidents

Fire drills are conducted at appropriate intervals and following change.

Adeptify reviews drill records and outcomes to:

• Identify weaknesses or recurring issues

• Ensure learning is captured

• Confirm actions are implemented

Fire incidents and false alarms are reviewed to identify trends or control failure.

9.8 Fire Safety Training and Roles

Fire safety training and role allocation, including fire wardens, are reviewed by Adeptify to ensure:

• Training coverage is adequate

• Roles are understood

• Refresher training is provided as required

Training completion alone is not treated as assurance.

9.9 Link to the Risk Register

Fire safety issues are logged to the Risk Register where:

• Controls are ineffective

• Defects are identified

• Behaviour undermines safety

• Actions are delayed or incomplete

Fire risks remain open until controls are verified as effective.

9.10 Escalation

Where fire safety risks remain unmanaged, controls are compromised, or actions are delayed, the issue will be escalated to the Headteacher and Governing Body.

Life safety risk will not be normalised.

10. COSHH and Hazardous Substances Management

The school recognises that exposure to hazardous substances presents a risk of injury and ill health to staff, pupils, contractors, and others who may be affected by school activities.

Hazardous substances are actively managed to prevent harm, not merely documented.

This section applies to all hazardous substances used, stored, generated, or brought onto the premises, including but not limited to:

• Cleaning and janitorial products

• Curriculum related substances

• Maintenance and caretaking products

• Fuels, oils, and lubricants

• Substances generated by activities, processes, or equipment

• Contractor substances where stored or used on site

If a substance has the potential to cause harm, it falls within scope.

10.1 COSHH Governance and Oversight

The Governing Body and Headteacher retain responsibility for ensuring exposure to hazardous substances is controlled.

Adeptify Ltd, as the appointed competent person, provides professional oversight, challenge, and assurance of COSHH arrangements.

This includes review of inventories, assessments, controls, and practice.

10.2 COSHH Inventory

A full COSHH inventory is completed and maintained for the site.

The inventory must:

• Identify all hazardous substances present

• Record product names and locations

• Identify intended use and frequency

• Identify who may be exposed

Partial inventories or sampling are not acceptable.

The inventory is reviewed at least annually and whenever new substances are introduced or removed.

10.3 Elimination and Substitution

For each substance identified, consideration is given to:

• Elimination of the substance

• Substitution with a less hazardous alternative

Where elimination or substitution is reasonably practicable, it is required.

Justification must be recorded where substances remain in use.

10.4 COSHH Risk Assessments

Site specific COSHH risk assessments are completed for each hazardous substance that remains in use.

Assessments:

• Reflect actual use and handling

• Identify routes of exposure

• Define control measures

• Specify storage and disposal arrangements

• Identify PPE where required

Generic or copied assessments are not acceptable.

10.5 Testing Controls Against Practice

COSHH controls are verified through:

• Inspection of storage and labelling

• Observation of use and handling

• Discussion with staff

• Review of incidents or near misses

Where practice does not align with assessments, this is treated as a control failure.

10.6 Training and Competence

Staff using hazardous substances must:

• Understand the risks

• Understand required controls

• Use substances as assessed

Adeptify reviews training coverage and competence as part of assurance activity.

10.7 Link to the Risk Register

The following must be logged to the Risk Register:

• Unassessed hazardous substances

• Inadequate controls

• Unsafe storage or handling

• Lack of training or understanding

• Failure to eliminate or substitute where reasonably practicable

COSHH risks remain open until verified as controlled.

10. 8 Escalation

Where hazardous substance risks remain unmanaged, unsafe practice persists, or controls cannot be implemented, the issue will be escalated through governance channels.

Unmanaged exposure risk will not be tolerated.

11. Planned Preventative Maintenance and Statutory Compliance Oversight

Planned Preventative Maintenance and statutory inspections provide evidence about the condition and performance of building systems that impact health and safety. They support risk management but do not, in themselves, control risk.

Effective health and safety management relies on how the outcomes of maintenance and inspection activity are reviewed, acted upon, and monitored.

11.1 Scope of PPM and Statutory Compliance

This section applies to all statutory inspections and maintenance activities that affect health and safety, including but not limited to:

• Fire detection and alarm systems

• Emergency lighting

• Firefighting equipment

• Electrical safety

• Gas safety

• Lifting equipment

• Pressure systems

• Asbestos management

• Water hygiene

• Local exhaust ventilation

• Playground equipment where applicable

The scope reviewed is proportionate to the site and its risk profile.

11.2 Governance and Oversight

The Governing Body and Headteacher retain responsibility for ensuring that statutory inspections and maintenance are carried out.

Adeptify Ltd, as the appointed competent person, provides oversight by reviewing maintenance arrangements and outcomes to identify health and safety risk.

Adeptify does not act as a facilities management service and does not book contractors or manage procurement.

11.3 Review of Planned Maintenance Arrangements

As part of competent person activity, Adeptify:

• Reviews the schedule of statutory inspections

• Identifies inspections due before the next review or visit

• Highlights overdue or at risk inspections

• Reviews completed inspection and servicing reports

This review is proactive and forward looking.

11.4 Review of Inspection and Servicing Reports

Inspection and servicing reports are reviewed by Adeptify to identify:

• Safety related defects or failures

• Limitations of inspection

• Advisory observations affecting risk

• Repeated or systemic issues

The presence of a certificate alone does not provide assurance.

11.5 Defects and Action Tracking

Where inspection or servicing identifies defects or limitations that affect health and safety:

• The issue is logged to the Risk Register

• Actions are defined with ownership and timescales

• Progress is monitored

• Completion is verified

Defects remain open until resolved or formally risk controlled.

11.6 Monitoring of Remedial Actions

Adeptify monitors remedial actions arising from maintenance activity to confirm that:

• Works have been completed

• Controls are effective in practice

• Risk has been reduced or eliminated

Assurance is not provided based on intent alone.

11.7 Escalation of Compliance Gaps

Where statutory inspections are missed, defects remain unresolved, or delays create increased risk, the issue will be escalated to the Headteacher and, where appropriate, the Governing Body.

Persistent non compliance is treated as a governance issue.

11.8 Maintaining Professional Boundaries

Adeptify does not:

• Book or instruct contractors

• Manage contractor performance or commercial matters

• Act as the school's facilities manager

Maintaining these boundaries protects independence and assurance.

12. Training, Competence, and Information

Training and information are essential controls within the school's health and safety management system. They exist to ensure that staff understand risks, know what is expected of them, and are competent to carry out their roles safely.

Training is not treated as a standalone compliance activity. It is considered alongside observed practice, incident history, and risk assessment findings.

12.1 Governance and Oversight

The Governing Body and Headteacher retain responsibility for ensuring that staff receive appropriate health and safety training and information.

Adeptify Ltd, as the appointed competent person, provides professional oversight and assurance that training arrangements are suitable, proportionate, and effective in controlling risk.

12.2 Mandatory Core Training

As a minimum, the school ensures that the following training is issued to staff at appropriate intervals:

- Health and safety awareness training
- Fire safety awareness training

These form the baseline for staff understanding of key risks and procedures.

12.3 Identification of Additional Training Needs

Additional or role specific training is identified where required, including where:

• Risk assessments identify higher risk activities

• New equipment, processes, or substances are introduced

• Incidents or near misses indicate control failure

• Inspections or observations identify unsafe practice

• Changes to pupil needs or behaviour increase risk

Training needs are proportionate to risk and role. Over training is avoided, but under training is not accepted.

12.4 Competence Beyond Completion

Completion of training alone does not provide assurance of competence.

Adeptify considers competence through:

• Observation of practice

• Discussion with staff

• Review of incident and near miss trends

• Review of supervision and behaviour

Where training has not translated into safe practice, this is treated as a control failure.

12.5 Information, Instruction, and Communication

The school ensures that staff are provided with clear information and instruction relating to:

• Risk assessments relevant to their role

• Safe systems of work

• Emergency and evacuation procedures

• Changes to arrangements or identified risks

Information must be accessible and understandable to those expected to follow it.

Adeptify provides assurance that information is not only issued but reflected in practice.

12.6 Recording and Monitoring

Training completion and identified gaps are recorded and monitored.

Where lack of training or competence contributes to risk, the issue is logged to the Risk Register and tracked to closure.

12.7 Escalation

Where training needs are not addressed, competence concerns persist, or unsafe practice continues, the issue will be escalated through governance channels.

Training that does not influence behaviour is treated as ineffective.

13. Accident, Incident, and Near Miss Reporting and Investigation

Harmondsworth Primary School recognises that accidents, incidents, and near misses provide essential information about how effectively health and safety risks are being controlled in practice.

All incidents are treated as opportunities to identify control failure, improve arrangements, and prevent recurrence.

This section applies to:

• Accidents resulting in injury or ill health

• Dangerous occurrences

• Near misses with the potential to cause harm

• Fire related incidents and false alarms

• Violence, aggression, or behaviour related incidents

• Contractor related incidents

If an event has the potential to indicate a failure of control, it must be reported.

13.1 Reporting Requirements

All accidents, incidents, and near misses must be reported without delay in line with school procedures.

Staff are expected to report:

• What happened

• Where it happened

• Who was affected

• Any immediate actions taken

Failure to report undermines the effectiveness of the system and will be addressed.

13.2 Initial Response

The school is responsible for ensuring that:

• Injured persons receive appropriate first aid or medical attention

• Immediate hazards are made safe where possible

• Serious incidents are escalated promptly to senior leadership

These actions do not replace investigation or review.

13.3 Investigation and Review

Investigations are proportionate to the severity and potential of the incident.

Adeptify Ltd, as the appointed competent person, reviews incidents and investigations to:

• Identify underlying causes

• Assess whether controls were suitable and sufficient

• Identify patterns or trends

• Determine whether additional controls are required

Adeptify may challenge findings or require further investigation where necessary.

13.4 Link to Risk Management

Where incidents indicate:

• Control failure

• Increased risk

• Gaps in training or supervision

• Unsafe practice becoming normalised

The issue is logged to the Risk Register and tracked to closure.

Incidents are not treated as isolated events.

13.5 Monitoring Trends

Adeptify monitors incident data over time to identify:

• Recurring issues

• High risk activities or locations

• Behavioural or supervision concerns

Trend analysis informs inspection focus, training needs, and system review.

13.6 Escalation

Incidents will be escalated where:

• Serious injury or significant harm occurs

• Similar incidents repeat

• Investigation identifies unmanaged risk

• Actions are not implemented effectively

Escalation may involve senior leadership or the Governing Body.

13.7 Learning and Communication

Learning from incidents is communicated to relevant staff where appropriate.

Changes to risk assessments, procedures, or training arising from incidents are implemented and monitored.

Incidents that do not lead to learning are treated as system failures.

14. Review, Audit, and Continuous Improvement

Harmondsworth Primary School is committed to maintaining a health and safety management system that remains effective, proportionate, and responsive to risk. Arrangements are not fixed. They are reviewed and improved over time based on evidence, performance, and change.

14.1 Purpose of Review

Review exists to confirm that:

• Risks are being effectively controlled

• Arrangements remain suitable and sufficient

• Controls operate as intended in practice

• The system responds to change and learning

Review is not limited to confirming compliance. It focuses on effectiveness.

14.2 Ongoing Review Through the Competent Person

Adeptify Ltd, as the appointed competent person, provides continuous review through:

- Regular inspection and monitoring
- Review of Risk Register status and trends
- Review of incident and near miss data
- Review of training effectiveness
- Review of maintenance outcomes and defects

This ongoing review informs assurance and improvement throughout the year.

14.3 Formal Periodic Review

In addition to ongoing review, the health and safety management system is formally reviewed at appropriate intervals.

Formal review considers:

- Overall risk profile of the school
- Effectiveness of controls
- Performance against identified actions
- Recurring or systemic issues
- Changes to activities, staffing, or premises
- Findings from inspections and incidents

Adeptify supports and informs this review through professional judgement and evidence.

14.4 Audit and Independent Scrutiny

Where audit activity is undertaken, it is used to test the effectiveness of arrangements, not simply their existence.

Audit may include:

• Internal governance review

• Review against LBH expectations

• External or thematic audit activity

Adeptify supports audit activity by providing evidence, clarification, and professional challenge.

Audit findings are treated as inputs to improvement, not criticism.

14.5 Triggers for Review

Review is undertaken outside of planned cycles where there is:

• Significant change to activities or premises

• Serious incidents or repeated events

• Identification of unmanaged or escalating risk

• Failure of existing controls

• Changes to guidance or expectations

Waiting for scheduled review in the face of change is not acceptable.

14.6 Continuous Improvement

Continuous improvement is achieved through:

• Learning from incidents and near misses

• Progressive reduction of risk where practicable

• Refinement of controls and procedures

• Targeted training and communication

• Strengthening of monitoring and assurance

Improvement actions are recorded, tracked, and verified through the Risk Register.

14.7 Governance Oversight

The Governing Body receives assurance that:

• Health and safety arrangements are actively managed

• Risks are identified and controlled

• Issues are escalated appropriately

• The system remains effective over time

Adeptify supports governance by providing clear, evidence-based assurance and challenge.

14.8 Escalation

Where review identifies persistent failure, unmanaged risk, or lack of engagement, the issue is escalated through governance channels.

A static or unresponsive system is treated as a failure of control