



## HEALTH AND SAFETY POLICY

THIS POLICY IS REVIEWED ON AN ANNUAL BASIS

**Policy reviewed by:** Jonathan Ritchie – Director of Estates and Facilities

**Review date:** 01/06/2024

**Submission:** 01/06/2024

**Version:** v7.1

**Policy actioned from:** September 2024

**Next review date:** 01/06/2025

**Reviewer's Signature:** 

Please note: 'School' refers to Chatsworth Schools; 'parents' refers to parents, guardians and carers.

This is a whole school policy, which also applies to the Early Years Foundation Stage.

## POLICY AMENDMENT PAGE

| <b>Date</b> | <b>Key Amendments</b>   | <b>Version Number</b> | <b>Reviewed by</b> |
|-------------|---|-----------------------|--------------------|
| 11/01/2018  | Policy Approved – Fit for use by schools.   | v1.1                  | RNB                |
| 01/12/2019  | Policy restructure and additional guidance added.<br>Section 4 Added to describe process of HSE management<br>Sections added included Water Hygiene, Food Hygiene, COSHH, Waste and Recycling and Utilties  | v2.0                  | RNB                |
| 31/08/2020  | Amended to reference CV19 Procedures and documentation.   | v3.0                  | RNB                |
| 01/09/2021  | RIDDOR Guidance for Schools reference added.<br>COVID-19 – when is it reportable under RIDDOR guidance added.<br>Working at Height section added.<br>Occupational Health section added.   | v4.0                  | RNB                |
| 01/09/2022  | Section 8.7 – Personal Protective Equipment on pages 16 & 17 updated in accordance with new Personal Protective Equipment at Work (Amendment) Regulations 2022  | v5.0                  | RNB                |
| 01/09/2023  | Removal of CV19 section resulting in numbering changes to sub-headings.   | v6.0                  | JR                 |
| 18/12/2023  | Section 7.26 – New regulations regarding chemicals in schools   | v6.1                  | JR                 |
| 01/09/2024  | Under the Statement of Intent, removal of the sentence : ‘An annual report of our performance in health and safety will be published’. Under section 3.4 ‘Emergency Procedures’ add that termly evacuaton plan must be within the first two weeks of the start of term). Under section 4.3 ‘Health and Safety Audits’, change of frequency of audit to every 4 years. Under section 7.5 ‘Electricity at Work (Permanent and Portable Equipment)’, removal of the option to complete 20% of the EICR on an annual basis, as it is cleaner to complete 100% of the EICR every 5 years. Wording change under section 7.8 ‘Personal Protective Equipment’ & specifically the heading ‘Personal Protection Equipment at Work (Amendment) Regulations 2022. Under section | v7.0                  | JR                 |



## Statement of Intent

Chatsworth Schools recognises and accepts the responsibility of delivering in accordance with the best practice in health and safety and has the responsibility of ensuring, as far as reasonably practicable, the health, safety, and welfare at work of all employees, under the *Health and Safety at Work Act* (1974). Chatsworth Schools aims to promote, actively, health and safety in the school. It is also recognised that incidents, accidents, and occupational ill health result from a variety of circumstances and are not necessarily the fault of an individual.

This commitment is extended to all people who may be affected by the education team's activities, including students, team users, contractors, and members of the public. The achievement of high standards of health and safety will be at the forefront of the team's policy, strategy, planning and activity.

The Operations team both at Chatsworth Schools and in each School or Nursery will put in place the appropriate organisational arrangements to ensure the delivery of our obligations in meeting all legislative requirements as a minimum standard. Resources, either financial or otherwise, will be made available to achieve this requirement. We have paid due regard to the DfE guidance '*Health and Safety Advice on Legal Duties and Powers for Local Authorities, Head teachers, Staff and Governing Bodies*' 2013.

All staff at Chatsworth Schools are accountable for the management of health and safety within their area of responsibility and this will be reflected in the annual performance management scheme. In particular, risk assessments must be completed, and action plans developed for individual teams within the team, which will be monitored by management teams.

In summary this policy aims to support Chatsworth Schools and the School/Nursery Leadership to-

- Provide and maintain a physically safe and healthy environment to work and learn within.
- Establish and maintain safety working procedures amongst staff, pupils, and all visitors to the school site.
- Have a robust procedure in place in case of an emergency event.
- Ensure that premises, equipment and their use are maintained safely and are regularly inspected.

It is recognised that high standards of health and safety can only be achieved with the active participation of all employees. Everyone is encouraged to co-operate in developing and delivering safe systems of work.

This Policy will be reviewed in the light of organisational changes, changes in working practices, but at least annually. Failure to comply with this health and safety policy and any guidance notes may result in disciplinary action being taken.

## 1.0 Roles and Responsibilities for Health and Safety

The below outlines the responsibilities of all staff in relation to health and safety. There are also details of specific roles that are undertaken to manage health and safety within Chatsworth Schools Team.

## 1.1 Chatsworth Schools Group

The Chatsworth Schools Group is ultimately responsible for health and safety management. In order to ensure that the health and safety policy is implemented, the Group will:

- Incorporate health and safety considerations into the Central Team plans, including targets for improving health and safety performance.
- Set a positive example to staff by actions.
- Promote good health and safety practice in schools and to ensure that Heads meet their responsibilities.
- Hold individuals at all levels within the team accountable for their health and safety performance.
- Ensure that adequate arrangements are made to consult with employees.
- Ensure that all staff receives adequate training, instruction, and supervision to enable them to effectively carry out their responsibilities.
- Ensure that suitable resources are provided to implement health and safety measures within their department.
- Seek guidance from relevant competent staff or external consultants to ensure compliance with health and safety standards.
- Ensure that any contractors are adequately vetted, selected, and monitored as regards their health and safety performance.
- Ensure all Heads are suitably trained.
- Advise and encourage the Heads of all schools/nurseries to meet the objectives of this policy statement- responsibility for health and safety has been delegated to them.
- Provide health and safety guidance to Heads of all schools emphasising the need for staff to be adequately trained in their health and safety responsibilities.
- Ensure that Heads and other Managers are informed of the relevant changes in the legislation.
- Audit annually the effectiveness of health and safety arrangements in all schools.

## 1.2 The Chatsworth Schools H&S Point of Contact – Head of Estates and Compliance

The appointment of a Chatsworth Schools Office Contact for Health and Safety does not change the responsibilities, both individually and collectively, of the staff in the Central Team or other members of Chatsworth Schools Management Team. The responsibilities of the Chatsworth Schools Point of Contact for Health & Safety are to:

- Communicate health safety and welfare information to Chatsworth Schools.
- Support the Chatsworth Schools Group and schools/nurseries in the management of Health, Safety and Environment (HSE) issues and related compliance.
- Assist the Heads in their monthly Health & Safety reports for the board.
- Support the School/Nursery, if identified, to undertake monthly/termly HSE inspections and HSE reviews and priorities actions.

### **1.3 Heads and Team Leaders**

Heads and Team Leaders are responsible for the implementation of the health and safety policy and action plans into operational practice in their own areas of responsibility. They consult appropriately with all employees on Health and Safety matters. They will:

- Ensure that there are adequate arrangements in place to implement the Chatsworth Schools policy.
- Ensure that all members of staff are held accountable for their health and safety performance in their school/nursery.
- Ensure their management team takes full account of health safety and welfare issues when planning developing or introducing new working methods, systems, equipment, or premises.
- Set a positive example to their staff through their actions.
- Appoint enough risk assessors and ensure that they are trained to carry out risk assessments.
- Ensure that risk assessments are undertaken within their area, records are kept, and an action plan/policy is produced to monitor and review the progress of the measures necessary to eliminate or control the risk. A list of relevant action plans/policies which each school/nursery may require is provided in section 2.0.
- Ensure that the necessary local action plans/policies, highlighting local arrangements are implemented and regularly reviewed to ensure ongoing suitability.
- Ensure that all staff receive adequate information, instruction, and training to enable them to undertake their responsibilities i.e., briefing on the related local actions plans/policies.
- Ensure that health and safety issues are adequately addressed in specifications prepared or contracts let and that operational aspects of contracts are adequately monitored.
- Ensure that there is an effective system for communication within their area of responsibility for health and safety issues.
- Seek advice from competent advisers on health and safety matters, if necessary, and act appropriately on the advice received. Appoint a School HSE Representative to support the Head in the management of HSE related issues, action, and compliance requirements.

Heads are responsible for the overall management of schools/nurseries, including health and safety responsibilities towards staff, students and visitors and control of the school premises. Heads and Chatsworth Schools must work together to establish their health and safety objectives using legal requirements as a minimum standard. Each school has a legal obligation to provide:

- A safe environment for students, staff, and visitors.
- Safe plant, equipment, and systems.
- Safe arrangements for the transport, storage and use of articles and substances.
- Safe and healthy conditions that take account of:
  - Local statutory requirements.
  - Approved Codes of Practice.
  - Chatsworth Schools Guidance.

- Adequate information, instruction, training, and supervision.
- All necessary safety and protective equipment.

The responsibility for ensuring that health and safety procedures within the school are adequate rests with the Head. Heads need to ensure that all necessary policies and local management plans/policies are devised, implemented, monitored, and reviewed to ensure their effectiveness and that they remain appropriate. They should:

- Ensure that the school has a current health and safety policy and associated local management plans/policies.
- Ensure that the school complies with the Chatsworth Schools health and safety policies, both in school and on all school activities.
- Have in place procedures to identify hazards and evaluate risk control measures (see Risk Assessment Policy and Procedure).
- Ensure monthly and termly inspections are carried out by an appointed person to identify hazards and that hazards identified are removed or controlled.
- Complete a termly HSE inspection to ensure compliance with related policies and management plans.
- Create management arrangements for health and safety and periodically monitor their effectiveness and hold a termly HSE Committee meeting.
- Ensure that an annual health and safety audit is carried out by a qualified person.
- Have health and safety on the agenda at SMT or SLT meetings.
- Ensure the School Health and Safety Representative carries out the appropriate responsibilities.
- Ensure necessary appointments such as first aiders, fire wardens are made and maintained.

#### **1.4 Line Managers / Supervisors**

Line Managers and Supervisors are responsible for ensuring the successful operation of the health and safety management system on a day-to-day basis. They are responsible for:

- Ensuring that they are aware of the health and safety legislation relevant to the work activities for which they have responsibility.
- Setting a positive example to their staff by their actions.
- Ensuring that the contents of the Chatsworth School's health and safety policy and local management plans/policies as well as guidance notes are communicated to their staff and that these are followed. See section 3 below for list of relevant management plans/policies.
- Ensure HSE inspections of the workplace at least once every month and undertake termly HSE inspections to ensure compliance.
- Acting on health and safety issues reported to them.
- Ensuring that risk assessments are carried out and that any actions arising to improve and implement control measures are taken.
- Providing support and assistance to risk assessors as required and ensuring that records of



relevant risk assessments are kept and easily accessible by all staff.

- Ensuring that the staff they are responsible for are held accountable for their health and safety performance via routine performance management.
- Ensuring their staff receive sufficient information, instruction, training and supervision to undertake their work safely.
- Ensuring that induction training for all staff, including temporary staff, is carried out on their first day to ensure that they are aware of the emergency procedures and risks within the workplace.
- Ensuring that all incidents, including verbal abuse and accidents are reported and investigated.
- Ensuring that all equipment supplied for use at work is suitable for its intended use and is maintained in good working order.
- Seeking advice from the education health and safety team if necessary.
- All Heads and Managers with responsibilities outlined in the school health and safety policy must ensure that effective arrangements are made to ensure that these functions are provided for in their absence.

## **1.5 Employee Responsibilities**

Health and safety is the responsibility of all employees; the support and involvement of all staff is needed if high standards of health and safety are to be achieved. Every employee should:

- Report hazards or potential hazards to line management.
- Act responsibly so as not to put themselves or others at risk.
- Work in accordance with any safety training provided and follow established safe working practices.
- Co-operate with management to enable them to carry out any health and safety responsibilities.
- Assist in any risk assessment or safety inspection process.
- Not interfere with or misuse anything provided in the interests of health and safety.
- Disclose details of any medical condition or medication that makes them unfit for or specifically at risk from any work activity.
- Immediately report any situation which represents a serious and imminent danger to health and safety to the Manager in control of the process/area.

## **1.6 Site Manager**

For staff who have responsibility for the control of a building, in addition to their other health and safety responsibilities, they must:

- Ensure risk assessments are carried out and subsequent control and actions are taken in respect of those areas of the building they are responsible for.
- Co-ordinate inspections of those areas of the building they are responsible for to ensure that



the building and equipment are safe and properly maintained and that access and egress is safe with no obstructions.

- Ensure that any statutory checks of equipment/plant in those areas of the building they are responsible for are undertaken as necessary.
- Maintain an up-to-date statutory documents file containing records of statutory tests and inspections.
- Ensure that those areas of the building they are responsible for are suitable for access by all as required by people with disability.
- Ensure suitable security measures are in place and operating.
- Ensure there are emergency procedures in place and that they are practised as necessary.
- Ensure a fire risk assessment is carried out as and when necessary and that local fire policy is in place and implemented.
- Co-ordinate the first aid arrangements within the building.

## **1.6 School HSE Representative**

For staff who have been appointed by the Head as the school's Health and Safety Officer, in addition to their other health and safety responsibilities, they must:

- Support the Head in the on-site management of Health and Safety within the school including the development of local management plans/policy and implementation.
- Organise and facilitate the terms Health and Safety meeting. Take meeting minutes/action log and ensure they are communicated to the relevant individuals.
- Support the workplace inspection process as and when requested.
- Review audits and inspections and communicate actions as and when. Provide an update on progress of actions within the terms HSE meetings and as requested by the Head.
- Procedure reports/progress updates as and when required by the Head.
- Review and communicate trends relating to Accidents and Incidents and ensure all incidents are appropriately investigated and action closed in a timely manner.

## **2. Health, Safety and Environment Management System (Documentation)**

All schools/nurseries are expected to develop their own, specific risk assessment and associated local management plans/policy documents depending on the risks identified. However, several policies and tools have been established to include specific Chatsworth school requirements, guidance, and useful tools. Please see Policies & Tool – HSE Document List for further information and details.

## **3. Planning and Managing of HSE within the School/Nursery**

### **3.1 Risk Assessments**

Heads/Nursery Managers are responsible for the development of school/nursery specific risk assessment/s and for appointing enough risk assessors to assess the potential health and safety risks arising from school activities and school operational activities under their control. Please see

the Chatsworth Schools Risk Assessment Procedure and Policy for further details on requirements.

In summary risk assessment or assessments will be undertaken for the following:

- **General Operations** including general operational items and areas including classrooms, offices, access, and egress, inside and outside space, traffic management, general activities such as arts and crafts etc.
- **Estate/Facilities Risk Assessments** including but not limited to Fire Risk Assessment, Asbestos Risk Assessment and management plans, construction, and refurbishment activities etc.
- **School Activities Risk Assessments** included but not limited to pupil supervision (including safeguarding and welfare requirements), Day Trips, Residential trips, supervised physical/sport activities.

Assessors will:

- Carry out risk assessments of all activities undertaken within their area;
- In conjunction with the Head and/or Site Manager develop a prioritised local action plan or school specific policy to control identified hazards and risks.

Heads will:

- Assist appointed assessors in undertaking assessments on activities within their control or carry out assessments.
- Develop and Implement action plans developed because of the assessment.
- Maintain a schedule of risk assessments.
- Inform staff of any significant findings and or controls that may affect them.
- Ensure that staff are trained in any procedures or work practices introduced because of the risk assessment process.
- Review risk assessments annually or if there is a change in the process.

Anyone likely to be affected by a risk assessment may consult the relevant risk assessment documentation and/or associated local management action plan or policy at any time on application to the appropriate Manager.

### **3.2 Risk Controls including Local Management Action Plan and/or Policies**

As a result of identified hazards and risks, controls will be referenced within the risk assessment document. Where significant and in-depth details are required the Head, or person appointed by the Head will establish a control plan or policy i.e., Local Estates HSE Management plan, Fire Safety policy or Water Hygiene Management Plan. A Head or Manager must ensure that all employees are aware of the relevant contents of the local management plans or policy and review and revise it as necessary. Such documents will be referenced with the HSE Calendar – Doc Revidw, Inspection and Test (HSE-T-005).

### **3.3 Training**

All Chatsworth Schools staff will be provided with appropriate training to enable them to carry out their responsibilities and work in a safe and efficient manner.

Specific job-related health and safety training will be identified by Heads/Managers during performance management interviews or development of risk assessment and associated control plans. Where practicable employees should be provided with training before being required to carry out new or unfamiliar task or operations and/or when required to use new equipment, plant, or machinery.

The Bursar/HR Officer will ensure that details of health and safety training are kept on personnel files.

Heads/Bursars must ensure that all new members of staff are provided with essential health and safety induction information on their first day at work which should then be updated annually.

Role specific training information will be referenced within the local management action plans or policies.

### **3.4 Emergency Procedures**

For each location, each Head must have suitable procedures in place to deal with any identifiable emergency, following the guidance in the guidance notes provided by Chatsworth Schools. See Fire Safety Policy & Lockdown Policy etc.

Specifically, in relation to fire or other emergency where evacuation of the building is considered the best response, the Head/Site Manager must:

- Ensure a fire risk assessment is carried out by competent assessor, implement any identified measures.
- Establish a local fire safety policy, evacuation action plan and evacuation route maps.
- Implement the fire safety policy and the included controls including:
  - Establish and practise at least a termly evacuation plan (within the first two weeks of the start of term).
  - Ensure that any means of escape is clearly marked and kept free from obstruction.
  - Provide suitable training and written details of evacuation and emergency procedures to all members of staff.
  - Ensure that appropriate fire alarm, firefighting, and fire detection equipment is installed in all workplaces and regularly inspected, tested, and maintained by a competent person.
- Provide suitable training and written details of the emergency procedures to all members of staff.

#### **4.0 HSE Monitoring, Inspections and Audits**

##### **4.1 HSE Inspections**

Formal HSE Inspections will be carried out monthly or termly by the Head/Nursery Manager or appointed persons. The Monthly HSE Inspection template should be tailored to suit the school/nursery.

As a result of the inspection, areas checked will be marked and actions taken and/or identified should be logged. Action need should be raised with the Head/Nursery Manager and prioritised. Inspection logs and actions arising should be reviewed as necessary as part of the school HSE committee or SLT meeting.

Termly, the Head should complete this inspection or separate inspection to review/ensure HSE compliance.

Inspections should also be completed in high-risk areas such as where chemicals or radioactive materials are stored, for use in Chemistry or Physics lessons, e.g., their storage must also be checked monthly. Where an inspection is required to control a risk/check compliance this inspection should be referenced in the relevant risk assessment and/or local management plan/policy. Inspections should be completed by the relevant Head of Department and documented.

##### **4.2 HSE and Estates related, Inspection and Tests**

Site Management is responsible for arranging and controlling monitoring for the records of the maintenance, testing and other activities referred to in this policy, and making them available for inspection, the Health and Safety Committee and review at audit. To assist there is an HSE – Doc Review, Inspection and Test Calendar template available. This document should be tailored by schools/nursery to ensure site specific.

Chatsworth Schools policies and requirements related to specific risks i.e., electrical installations are provided below within Section 7.

##### **4.3 Health and Safety Audits**

Every school should have an audit carried out every 4 years, which should be carried out by a competent person. Chatsworth Schools will appoint a competent person to carry out an audit. This audit and associated action raised should be reviewed with the auditor by the Head on completion and where necessary, actions required, prioritised. Actions and outcomes should be reviewed at the HSE Committee and raised with the Central Team as necessary.

#### **5.0 Review of HSE Compliance and Information**

##### **5.1 School HSE Committees**

Each Chatsworth School shall have a School HSE Committee. The Committee shall meet regularly throughout the year to discuss health and safety issues, approve school risk assessments, and recommend courses of action. The committee will be chaired by the School Health & Safety Officer.

Local health and safety issues should be resolved within the relevant school, where possible in consultation with the Chatsworth Schools Head of Estates and Compliance. Matters with service implications and those that cannot be resolved locally should be referred to the Chatsworth Schools Central Team Head of Estates and Compliance.

## **6.0 HSE related reporting requirements**

### **6.1 Reporting Health and Safety Issues**

The responsibility for resolving operational health and safety issues lies with the normal line management chain, with its established lines of communication and accountability.

Any employee who believes that a health and safety hazard exist with their work or workplace, should inform their immediate Manager/Supervisor who is responsible for resolving the issue, where possible. If the matter cannot be resolved at this level, it should be referred to senior management. Issues remaining unresolved should be referred to the Chatsworth Schools Head of Estates and Compliance. The advice from Chatsworth Schools is available at any stage in this procedure.

### **6.2 Incident / Accident Reporting and Investigation**

All incidents including verbal abuse, threatening behaviour, physical violence and fire and all accidents must be reported, see the Incident and Accident Reporting Policy for further details.

An investigation must be carried out into any incident. Any accidents to staff, pupils and visitors, including those which are reportable under RIDDOR, must also be recorded in the appropriate place. See Incident and Accident Reporting Policy.

If an accident is reportable under RIDDOR; the RIDDOR Guidance for Schools must be followed. This guidance can be found here: <https://www.hse.gov.uk/pubns/edis1.pdf>

### **COVID-19 – When is it reportable under RIDDOR?**

RIDDOR (The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013) requires the 'responsible person', essentially the employer, or for the self-employed or others, the person in control of the workplace, to report a variety of work-related events. To ensure compliance with RIDDOR, whilst also avoiding an unnecessary report, the responsible person must first understand the potential triggers for the reporting obligation to arise. Then they must examine the facts of each case carefully to determine whether each limb of the relevant threshold for reporting has been met.

The government has added Covid-19 to the list of notifiable causative agents under the Health Protection (Notification) Regulations 2010. In addition, under the Control of Substances Hazardous to Health Regulations 2002, coronavirus has been identified as a biological agent as part of the HSE's supplementary list of defined agents. Consequently, in relation to Covid-19, there are three potentially relevant obligations:

### **Member of the public and non-work-related cases**

There is no requirement under RIDDOR to report incidents of disease or deaths of members of the public, patients, care home residents or service users from COVID-19.

The reporting requirements relating to cases of, or deaths from, COVID-19 under RIDDOR apply only to occupational exposure, that is, because of a person's work.

## **What to report**

You should only make a report under RIDDOR when one of the following circumstances applies:

- An accident or incident at work has, or could have, led to the release, or escape of coronavirus (SARS-Cov-2). This must be reported as a dangerous occurrence.
- A person at work (a worker) has been diagnosed as having COVID-19 attributed to an occupation exposure to coronavirus. This must be reported as a case of disease.
- A worker dies because of occupational exposure to coronavirus. This must be reported as a work-related death due to exposure to a biological agent.
- Dangerous occurrences.
- Dangerous occurrences are certain unintended, specified events, which may not result in a reportable injury, but which do have the potential to cause significant harm.

For an incident to be reportable as a dangerous occurrence, the incident must have resulted (or could have resulted) in the release or escape of coronavirus, that has, led to a possible or actual exposure to coronavirus.

The assessment does not require any complex analysis, measurement, or test, but rather for a reasonable judgement to be made as to whether the circumstances gave rise to a real risk or had the potential to cause significant harm.

## **Cases of disease: exposure to a biological agent**

When deciding if a report is required, the responsible person (usually the employer) must make a judgement, based on the information available, as to whether a confirmed diagnosis of COVID-19 is likely to have been caused by an occupational exposure, that is, whether there is reasonable evidence that a work-related exposure is the likely cause of the disease.

The report should specify a disease due to exposure to a biological agent and use the "case of disease" report form.

## **Work-related deaths due to exposure to a biological agent**

For an incident to be reportable as a death due to occupational exposure to coronavirus there must be reasonable evidence that a work-related exposure caused the worker's death.

The responsible person should notify the enforcing authority by the quickest practicable means, without delay, and send a report within 10 days. The report should specify death due to exposure to biological agent using the "case of disease" report form.

## **RIDDOR reporting of COVID-19 –**

<https://www.hse.gov.uk/coronavirus/riddor/index.htm>

<https://www.hse.gov.uk/riddor/>

### **6.3 HSE Monthly reporting**

Heads are required to provide a monthly compliance report to the board via the Senior Leadership Team. Any issues/concerns relating to HSE should be reported via this document.

## **7.0 Arrangements/Policies for Managing Specific Health and Safety items**

This part of the Policy describes the arrangements that are in place to manage health and safety within Chatsworth Schools. It sets out the minimum standards to be achieved on any specific issue. In some cases, these standards are supported by checklists and forms, which are available from the Chatsworth Schools office.

### **7.1 First Aid**

Heads, for all locations will undertake an assessment to determine an adequate and appropriate level of first aid provision.

Based on the assessment, Heads will ensure that:

- A local First Aid Policy document detailing arrangements and associated controls and management actions is in place. See First Aid and Medical Welfare Policy.
- There are an adequate number of trained first aiders and that there are clear arrangements in place to contact them in the event of first aid being needed.
- Adequate equipment and facilities (e.g., first aid boxes) are always available and readily available.
- Clear arrangements are in place to contact the emergency medical teams.
- All staff are informed of the arrangements.

### **7.2 Slips Trips and Fall**

Trips and slips tend to be the most frequent source of accidents in many schools, and staff, pupils and visitors should be made aware of these dangers.

- There should be no running in corridors or on stairways.
- Signs must be displayed prominently if floors are wet and the area closed off, if necessary.
- Signs should be prominent where the ground is uneven.
- Stairs and steps should have the leading edge in a different colour.
- All corridors and stairways must have sufficient lighting.

School specific risks and associated controls will be included within the relevant risk assessment and checked via the HSE Inspection.

### **7.3 New or Expectant Mothers**

- Heads should ensure that a risk assessment is carried out on any new or expectant mother, as soon as they are aware of the situation, to identify any work activity, which may adversely



affect their health and safety or that of the baby. The Manager and Risk Assessor should review this assessment every six weeks (because pregnancy is a progressive state), to ensure that unacceptable risks have not arisen.

- Where unacceptable risks to a new or expectant mother are identified, the Head, in conjunction with Human Resources, find alternative duties for that individual. This action should be recorded in the relevant risk assessment. In cases where safe, alternative work cannot be found the pregnant member of staff should be given leave on full pay, in line with Human Resources Policies.

#### **7.4 Manual Handling Operations**

- Heads/Managers responsible for work areas where manual handling occurs will avoid the need for manual handling wherever practicable by changes in work processes or by the introduction of mechanisation.
- Heads/Managers are responsible for ensuring risk assessments are carried out by a competent risk assessor and will implement any significant findings from the assessment. They will inform all relevant staff of the assessment and its findings, ensuring staff undertake any training identified.
- The risk assessment will be reviewed annually or when there is a change in the work process or equipment.

#### **7.5 Electricity at Work (Permanent and Portable Equipment)**

Heads/Managers/Site Managers will ensure that:

- all permanent electrical installations, systems and appliances are safe for use and free from mechanical and electrical defect when in use. Electrical Installation Condition Reports (EICRs) must be completed every 5 years (100% of the installations). FAT (Fixed Appliance Testing) must be completed at the same time as Electrical Installation Condition Report (EICRs) & every 5 years.
- Any works to the permanent electrical installation system is completed by a competent person.
- On completion of any work to permanent electrical installation an Electrical Inspection Test Certificate should be obtained and retained.
- Electric circuit boards should be within cupboard(s)/designated room(s) where practical and marked/signed. Locations should also be marked on site plans/emergency route plans.
- Maintain an inventory of portable electrical equipment used and update when necessary.
- Ensure checks of the portable electrical equipment are carried out, in accordance with local requirements or as per manufacturers or supplier's instructions by a competent person, and that a record of this test is kept.
- Undertake or arrange on an annual rotation a full visual inspection of all portable electrical equipment and full Portable Appliance Testing (PAT testing). Inspection/testing should be logged/recorded on schedule.
- Undertake during the monthly HSE inspection, a visionary inspection of a sample of portable electrical equipment.

All Staff shall ensure that:

- Portable electric equipment not owned by the school/nursery is visually inspected prior to use and where necessary included within PEE schedule for future inspections. If deemed necessary the Site Manager will ensure that risk assessments consider the location, fitness

for purpose, and maintenance of electrical equipment.

- Staff and students are not permitted to bring or use any personal portable electrical equipment on-site, unless permission is granted from the Site Manager and a visual inspection of the of the equipment was carried out by an authorised person.
- Prior to each use a visual inspection of permanent and portable electrical equipment is completed. Repairs/additions to electrical equipment or installation should only be undertaken by trained and competent persons. Any member of staff identifying broken, damaged or faulty electrical equipment should ensure that the equipment is not used and report the matter to their Line Manager/Site Manager.
- All electric equipment (if safe to do so) should be turned off when in use and at the end of each day.

## **7.6 Provision & Use of Work Equipment**

Heads/Nursery Managers and Site Managers will:

- Ensure that all equipment supplied for use at work is suitable for its intended purpose and maintained in good working order, with records of maintenance being kept.
- Ensure relevant work equipment will be regularly inspected, and inspection recorded.
- Provide staff with adequate information, instruction, training, and supervision when permitting them to work with equipment. Heads/Managers will document safe operating procedures if applicable.

All Staff are responsible for:

- Working in accordance with safety procedures.
- Not tampering with any safety equipment provided.
- Staff and students are not permitted to bring or use any personal portable electrical equipment on-site, unless permission is granted from the Head and inspection of the equipment was carried out by an authorised person.
- Reporting any faulty equipment to their manager and clearly identifying the equipment as being out of service.

## **7.7 Play Equipment**

Heads/Nursery Managers and Site Managers will:

- Ensure that all equipment supplied for use within the playground (static and mobile play equipment) is suitable for its intended purpose and maintained in good working order, with records of maintenance being kept.
- Relevant equipment will be regularly inspected, and inspection recorded.
- Ensure that static installed playground equipment should be inspected by a competent person on an annual basis and the inspection is recorded and logged and any actions raised are taken as appropriate.

All staff will:

- Prior to use of play equipment, complete a visual inspection. Where there are concerns raised, equipment should be put out of use and raised with the Head/Nursery Manager and/or Site Manager.

## 7.8 Personal Protective Equipment

### Personal Protective Equipment at Work (Amendment) Regulations 2022

Personal Protective Equipment (PPE) is legally defined as ‘all equipment (including clothing affording protection against the weather), which is intended to be worn or held by a person at work and which protects the user against one or more risks to their health or safety’. Examples of PPE include safety helmets, respiratory protection, gloves, safety boots or other protective footwear, eye protection, high-visibility clothing, warm and weatherproof clothing.

The Personal Protective Equipment at Work (Amendment) Regulations 2022 (PPER 2022) states that the types of duties and responsibilities on employers and employees under PPER 1992 will remain unchanged but will extend to limb (b) workers. A limb (b) worker is a person who doesn’t work for themselves but who is not an employee as their work is irregular. They work under a contract for service. If PPE is required, employers must ensure their workers have sufficient information, instruction, and training on the use of PPE. Employers need to carefully consider whether this change to UK law applies to them and their workforce and make the necessary arrangements to comply.

#### Key Actions

Employers should:

- Carry out a risk assessment of the workplaces and work activities they are responsible for and through implementation of the risk assessment findings, remove or as far as is reasonably practicable, reduce the risk of the identified hazards causing harm to workers or others who may be present in the workplace.
- Provide PPE where other means fail to reduce the risk presented by hazards in the workplace to an acceptable level.
- Carry out an assessment to identify the most appropriate types of PPE for use in the workplace.
- Where PPE is required ensure that it is:
  - is appropriate for the risks and for the working environment.
  - takes account of the user’s health, ergonomic, physical, and other factors.
  - adequately controls the risk presented by the hazard without increasing the overall risk experienced by the worker.
- Supply and replace PPE free of charge.
- Comply with relevant legislation governing PPE design and manufacture.
- Where reasonably practicable, provide a range of PPE to allow workers to choose the equipment that best suits their working environment and routines; however, the employer must always ensure that the alternatives made available provide the level of protection required.
- Provide training, instruction, and information, including refresher training and demonstrations, as appropriate in the use and care of the PPE provided.
- Ensure face fit testing is undertaken for close fitting respiratory protective equipment.
- Establish a system of recording the issue of PPE and of monitoring, examination, and repair for PPE and also to allow for reporting of missing or lost items.

Employees and workers should:

- Correctly use any PPE provided as directed and in accordance with any training, instructions, or information they have received.
- Return PPE to its storage place after use unless agreed otherwise with the employer.
- Take care of PPE.
- Report defects or loss of equipment as soon as they become aware of them.

All employees are required to wear footwear and clothing that is appropriate to the nature of their work.

Where the need for Personal Protective Equipment (PPE) has been identified as required by risk assessment, the Head/Manager responsible for the work area will ensure that:

- The PPE selected is appropriate to protect the wearer from the hazards.
- The PPE is compatible with other items of PPE and is comfortable to use.
- The PPE is used.
- The PPE is maintained and cleaned to ensure effective use.
- Appropriate storage is provided for equipment when not in use.
- Sufficient stock of PPE is provided to protect staff and any visitors to the area.
- Staff are trained in the use of PPE.
- The cost of providing PPE will be borne by the department.
- All employees should ensure that where provided, all such protective clothing and equipment is worn, used, and stored correctly and that damage or loss is reported.

## 7.9 Workplaces

All staff are responsible for ensuring that:

- Workplaces are kept tidy and free from hazards.
- Access and egress routes, particularly fire escape routes, are kept clear and free from any obstructions.

Heads/Site Managers are responsible for ensuring that workplaces are maintained in an efficient state, in good working order and in good repair. To achieve this, they will:

- Provide sufficient ventilation to all workplaces.
- Ensure that all workplaces have a reasonable temperature during working hours.
- Provide suitable lighting.
- Ensure the workplace is clean.
- Maintain floors and traffic routes.
- Ensure that, where necessary for reasons of safety, glazing is protected against breakage and has, where necessary, visible signs to prevent accidents.
- Provide suitable and sufficient toilet facilities, washing facilities and drinking water.
- Provide suitable rest facilities and facilities for changing clothing if required for work.

### **7.10 Violence at Work**

Violence at work is described as any incident in which an employee is abused, threatened, or assaulted by a member of the public, staff, or contractor while they are at work. Such incidents should be reported through the Chatsworth Schools incident/accident reporting procedure. Each incident must be investigated by the Head or Manager to prevent a re-occurrence of a similar incident.

Every Head/Manager should assess every activity that may result in violence and ensure measures are taken to reduce the likelihood of a violent act occurring. Where it is identified that there is a potential for violence arising from the activity the measures taken could include additional security, training for staff, etc. Staff and their representatives must be consulted on any measures introduced.

### **7.11 Lone Working**

Chatsworth Schools follows the Chatsworth Schools Lone Working Policy, please reference for additional information.

The term “lone working” applies to staff where working practices mean that they are solitary and/or when there is no close or direct supervision.

Heads/Site Managers of lone workers will:

- Ensure that risk assessments are carried out to identify any special risk to lone workers and implement any actions arising out of the assessment.
- Ensure that there are suitable systems in place to supervise lone workers.
- Ensure that lone workers have adequate access to first aid provision.

### **7.12 External/Off-Site Visits**

Any organised visit or trip involving young people or students that occurs away from a school or another establishment is termed an external visit. These visits must be authorised by the Head/Nursery Manager, who must ensure that:

- A risk assessment is carried out for the visit, identifying all measures necessary to control the risks identified and this is documented and filed.
- Chatsworth Schools guidance is followed in arranging the visit.
- Details of any possible emergency are detailed and the actions necessary in the emergency outlined.
- Sufficient supervision by competent people is available.

See also section in First Aid and Administration of Medication Policy for a more detailed description.

### **7.13 Site Traffic / Vehicles**

The Head/Nursery Manager and/or the Site Manager will ensure that:

- Where appropriate, arrangements are made at each site to segregate vehicles and people and that there are safe working practices for loading and unloading vehicles.
- The school may provide all staff and where appropriate regular visitors a suitable decal to be displayed in the car so that the vehicle may be identified.

All Staff will:

- When bringing vehicles onto Chatsworth Schools' school premises must comply with site speed restrictions and signage. Vehicles must only be parked in designated parking spaces.
- Pedestrians should only use pathways or designated pedestrian routes and keep clear of traffic routes.

## **7.14 Lifts**

All passenger and goods lifts will be installed, maintained, inspected, and used in a safe manner and in accordance with manufacturing and maintenance instructions.

Heads/Site Managers are responsible for ensuring the inspection and, where necessary, repair of passenger and goods lifts. They will establish local arrangements for the release of trapped passengers. The release of passengers will only be attempted by trained, competent persons.

## **7.15 Asbestos**

Heads/Nursery Managers and the Site Managers must:

- Carry out a risk assessment of each location to identify appropriate actions to control the risk. All known asbestos-containing materials shall be clearly marked and details of location, type (if known) and condition recorded in a site asbestos register, which shall be kept onsite and made available to anybody who needs to know where asbestos is located.
- Ensure an asbestos management plan is developed to control and manage asbestos-containing materials on site. The plan must include an emergency procedure to be followed in the event of a suspected release of asbestos containing materials or where asbestos containing materials are damaged.
- Ensure that prior to any relevant works the asbestos risk assessment and associated management plan will be shared with the contractor/s involved.
- Ensure that any work on or with asbestos-containing materials shall be carried out in accordance with the appropriate legislation and with good working practice. Any material suspected of being asbestos must be treated as asbestos until proven otherwise.

## **7.16 Water Hygiene**

Heads/Nursery Managers and Site Managers must:

- Ensure that water quality checks are carried out at regular intervals to ensure that the water is safe and free from dangerous bacteria or chemicals.
- Ensure the completion of a site wide legionella risk assessment, recommendations of which will be used to formulate an action plan and an on-going monitoring schedule i.e., water hygiene management plan.
- Control measures/actions included in the management plan shall include:
  - o Monthly monitoring of hot and cold outlets and temperatures.



- o Quarterly cleaning of shower heads.
- o Six monthly temperature testing of cold-water storage tanks and tanks inspections.
- o Regular maintenance and cleaning of outlets and TMVs.
- o Annual legionella testing of a selection of outlets.
- Arrange for any actions arising out of the quality checks to be taken, to ensure the safety of staff and visitors.

### **7.17 Safety of Pressure Systems**

- The school recognises that the regulations will apply to all pressure systems on site containing steam at any pressure, or gas, or liquid, or a mixture of both at a pressure greater than .5bar (7psi);
- The school will use information available from their competent person who carries out current thorough examinations and tests of pressure systems, to establish the safe operating limits of its pressure systems.

### **7.18 Boiler Safety**

If different from above, the Heads/Nursery Managers and Site Managers will:

- Ensure that all boiler (gas/biomass) are safe for use and free from mechanical and electrical defect when in use.
- Ensure inspection and tests are completed annually and/or as per manufacturer guidelines.
- Ensuring boiler rooms/cupboards and associated valves are free from obstruction and accessible in the event of an emergency.
- Boiler rooms/cupboards should be clearly marked and marked on the relevant site plan/emergency route plan for information.

### **7.19 Stress**

Heads/Nursery Managers should:

- Be aware of the symptoms of stress.
- Identify working practices likely to cause stress in their risk assessments.
- Implement measures to reduce stress.

See related HR policies for additional information on the management of employee welfare including stress.

### **7.20 Contractors**

Only contractors who have been assessed for competency may undertake work. The Site Manager is responsible for ensuring that:

- Contractors selected and employed to carry out work for the department are competent to undertake the work safely.
- The contractor's health and safety systems are assessed.
- The contractor's insurance is in place and up to date.



- The contractors conduct their operations in accordance with the CS's Health and Safety Policy and any relevant local procedures.
- The contractor is not put at risk by the school's own activities.
- The contractor is informed of any known risks and the precautions to be taken.
- Where applicable the contractor is informed of relevant emergency procedures.
- Effective methods of managing contractors and monitoring on-site performance are put in place.

Contractors will be expected to:

- Carry out their work in a manner which does not put their staff, education department or members of the public at risk.
- Display warning signs and notices as appropriate.
- Carry out risk assessments for the work to be undertaken and provide the school with method statements, training records, etc., as appropriate.

## **7.21 Visitors**

All visitors should be asked to report initially to an appropriate reception point. The visitor should sign in and always wear a security pass on Chatsworth Schools premises.

The member of staff who greets, or escorts the visitor:

- Is responsible for informing them of any hazards that are likely to affect them.
- Must ensure that the visitor is informed of the action to take in the event of fire or another emergency.

See Chatsworth School Visitors & Visiting Speakers Policy for additional information.

## **7.22 Site Security**

- The school places great importance on the safety and security of our students, staff and visitors. Whilst an open site is challenging to secure, we have strict procedures and protocols in place which are intended to prevent unauthorised access (keypad code systems) yet allow free and uninterrupted use to those authorised as members and part of our school community.
- Our own in-house support and teaching staff are responsible for security duties as part of their duties.
- Our procedures are to be kept under constant review and amended as necessary and appropriate.

See Chatsworth School Security Policy and the local Lockdown Policy for additional information.

## **7.23 Smoking**

- The whole School is a non-smoking site.

### 7.24 Supervision

For supervision of pupils to ensure their Health and Safety so far as is practicable, see separate Supervision of Pupils Policy.

### 7.25 Food Hygiene

Heads/Nursery Managers and/or Site Managers must:

- Ensure that suitable and sufficient food hygiene management system and controls (incorporating Hazard Analysis Critical Control Points) are in place to ensure hazards and risks related to food hygiene are managed.
- Ensure that, where catering is outsourced, they have the appropriate process and management controls in place;
- Ensure regular inspections are completed to ensure management controls are being implemented and of food preparation areas.
- Ensure that relevant staff have received a minimum of Level 2 Food Hygiene.

All Staff must:

- When working with food ensure they comply with the requirements of the relevant food hygiene management system.

### 7.26 Control of Substances Hazardous to Health (COSHH)

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

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

Heads/Nursery Managers and/or Site Managers are required to:

- Ensure Control of Substances Hazardous to Health (COSHH) risk assessments are completed for hazardous material and briefed to relevant employees.
- Ensure staff will also be provided with protective equipment, where necessary.

All staff should:

- Use and store hazardous products in accordance with instructions on the product label.
- All hazardous products are kept in their original containers, with clear labelling and product information.

### Supply of chemicals – New Regulations

The regulations for supplying explosive precursors and poisons was updated on 27<sup>th</sup> September 2023 and came into force on 1<sup>st</sup> October 2023. These put in place new requirements on the supply of certain chemicals, which include the following commonly used in schools:

- Explosive precursors: acetone, aluminium powders, hydrochloric acid, hydrogen peroxide, sulfur and sulfuric acid.
- Poisons: ammonia, phenols, sodium hydroxide, sodium nitrite and sodium hypochlorite solutions.

The regulations state that businesses and professional users should be verified by the supplier every time a new purchase is made of these regulated chemicals.

Where they are being supplied frequently or on a routine basis to the same professional user or business, verification should occur every 18 months or whenever there is a change or deviation from normal purchasing patterns. This is something suppliers can choose to do, but give schools don't generally make frequent purchases of these chemicals, it is likely that the information will be required each order.

The person making the sale (the supplier) must obtain the following from the business customer (i.e., the school):

- i) the business customer's name and address. If the business customer is not an individual, the name of an individual who is authorised on behalf of the business customer should be recorded;
- ii) a form of photographic identification of the business customer or, if the business customer is not an individual, of the individual making the purchase; this could be a school photo ID card;
- iii) a statement of the nature of the business customer's trade, business or profession, or of the public function that the business customer performs; and the business customer's VAT registration number, if the business customer has such a number.

Your school will have to decide who is authorised on behalf of the businesses to make the purchase (the name on the order must match the individual). For schools it is most likely to be a Technician, Head of Science or Finance Manager.

There is no licence, which applies to these regulations, so there is nothing schools will need to apply for.

This information should be provided when requested by the company making the sale, there is no need to provide it in advance.

Further details including a list of the regulated substances and concentration thresholds can be found in the Explosives precursors and poisons: general guidance on the government website.

As a school, you may also want to consider who will be your authorised person going forward.

## **7.27 – Utilities**

Heads/Nursery Managers and/or Site Managers are required to:

- Ensure all utilities meters and inlet/outlet valves locations are recorded on site/building plans.
- Maintaining a schedule of utility meters including photo, location, MPAN number, meter number, supplier/broker, and meter reading.
- Ensure where accessible utilities meters are read on a monthly basis (as close to the 1<sup>st</sup> of the month as possible) and recorded;
- Review utilities usage regularly and investigate any discrepancies.

### **7.28 – Waste Management and Recycling**

All staff should:

- Ensure where possible waste is minimised.
- Ensure where practical waste is sorted and segregated on site and then removed to maximise off site recycling.
- Ensure that all hazardous waste (including WEEE, Lighting Tubes, Batteries, COSHH waste etc) is stored in a designated area/location.

Heads/Nursery Managers and/or Site Managers are required to:

- Ensure where possible waste is minimised and plans are put in place to support this;
- Ensure where practical waste is sorted, segregated on site, and then removed to maximise off site recycling.
- Ensure that all hazardous waste (including WEEE, Lighting Tubes, Batteries, COSHH waste etc) is stored in a designated area/location and that is the dealt with in accordance with the hazardous waste duty of care requirement.
- Ensure all waste is removed by a licenced contractor and maintain records of relevant licences and contracts.
- When waste is removed, obtain a copy of the waste transfer note or hazardous waste consignment note.

### **7.29 – Working at Height**

The purpose of The Work at Height Regulations 2005 is to prevent death and injury caused by a fall from height. If you are an employer or control work at height (e.g., Site Managers or Building Owners who may contract others to work at height) the regulations apply to you.

Employers and those in control of any work at height activity must make sure work is properly planned, supervised, and carried out by competent people. This includes using the right type of equipment for working at height. Low-risk, relatively straightforward tasks will require less effort when it comes to planning.

Employers and those in control must first assess the risks.

Employees have general legal duties to take reasonable care of themselves and others who may be affected by their actions, and to co-operate with their employer to enable their health and safety duties and requirements to be complied with.

Before working at height, you must follow these simple steps:

- Avoid working at height where it is reasonably practicable to do so.
- Where working at height cannot be easily avoided, prevent falls using either an existing place of work that is already safe or the right type of equipment.
- Minimise the distance and consequences of a fall, by using the right type of equipment where the risk cannot be eliminated.

You should:

- Do as much work as possible from the ground.
- Ensure workers can get safely to and from where they work at height.
- Ensure equipment is suitable, stable, and strong enough for the job, maintained and checked regularly.
- Not overload or overreach when working at height.
- Take precautions when working on or near fragile surfaces.
- Provide protection from falling objects.
- Consider emergency evacuation and rescue procedures.

Staff are only permitted to use school ladders, which have been audited and checked by the authorised individual. Every time you use a ladder you should do a pre-use check beforehand to make sure that it is safe for use. A pre-use check should be carried out by:

- The user.
- Before using the ladder for a work task.
- After something has changed, i.e. a ladder dropped or moved from a dirty area to a clean area (check state or condition of feet);

The benefit of conducting pre-use checks is that they provide the opportunity to pick up any immediate/serious defects before they cause an accident.

- Things to look for – Leaning ladders:
- The stiles of the ladder need to be in good condition (Do not use the ladder if the stiles are bent or split as the ladder could collapse).
- Check the feet (Do not use the ladder if the feet are missing, worn or damaged as the ladder could slip).
- Check the rungs (Do not use the ladder if the rungs are bent, missing or loose as the ladder could become unstable).

Things to look for – Stepladders:

- Checking the locking bars (Do not use the stepladder if locking bars are bent or the fixings are worn or damaged as the ladder could collapse).
- Check the feet (Do not use the stepladder if feet are missing, worn or damaged as the ladder could slip).
- Check the stepladder platform (Do not use the stepladder if the platform is split or buckled, the stepladder could become unstable or collapse).
- Check the steps/treads (Do not use the stepladder if the steps/treads are contaminated as they could be slippery).
- Check the steps for strength and stability (Do not use the stepladder if the fixings are loose as they could collapse).
- Check the stiles (Do not use the stepladder if stiles are bent or damaged as the ladder could buckle or collapse).

### **7.30 – Occupational Health**

Managers will include workplace stress as part of the risk assessment process identifying areas of concern e.g. workload, job security etc. and implement appropriate control measures, so far as is practicable.

Where workplace stress arises, Managers will deal with the situation in a sensitive and constructive manner using all available means including the School's Wellbeing Representative.

Staff may choose to self-refer to the School Wellbeing Representative.

### **Interpretation**

In this policy, the term "senior manager" means the School Head and their designated deputies.

This policy applies to all employees in all Schools (save for Schools with their own procedure which shall prevail) and other work environments within Chatsworth Schools.

This policy applies within all companies, which are wholly owned subsidiaries of Chatsworth Schools Ltd, a company registered in England, registered number 11552579.

The registered office of all companies is Crimea Office, The Great Tew Estate, Great Tew, Chipping Norton, Oxfordshire, OX7 4AH. Any enquiries regarding the application of this policy should be addressed to the Director of Information at the above address.

This policy does not form part of any employee's contract of employment and may be amended at any time.