



# Mill Water School

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## HEALTH AND SAFETY POLICY

### SECTION 1: STATEMENT OF INTENT

The Governing Body of Mill Water School will strive to achieve the highest standards of health, safety and welfare consistent with their responsibilities under the *Health and Safety at Work etc Act 1974* and other statutory and common law duties.

This policy sets out how these duties will be conducted and includes a description of the school's organisation and arrangements for dealing with different areas of risk. Section 2 will establish specific responsibilities at all levels of the school's organisation. Section 3 will outline the specific arrangements put in place to manage these areas of risk and hence to meet the school's obligations under the law.

This policy will be brought to the attention of all members of staff at induction. A paper copy is stored in the main SLT office, and an electronic copy is stored on the school's admin (F) drive.

This policy statement and the accompanying organisation and arrangements will be reviewed annually by the Governing Body and any changes required to be brought to the Full Governing Body for final approval.

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Chair for the Governing Body

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Date

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Head Teacher

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Date

## SECTION 2: ORGANISATION

### The Duties of the Governing Body

- To produce and regularly review the Health and Safety Policy for the school. This policy will reflect the requirements of the *Health and Safety at Work etc Act 1974* by outlining arrangements to ensure, so far as is reasonably practicable, the health, safety and wellbeing of staff, pupils and others affected by the organisation.
- To monitor both compliance with, as well as the effectiveness of, this policy.
- To provide adequate resources to meet the school's legal responsibilities as well as compliance with this policy.
- To assist the Governing Body in discharging its legal obligations, the school has appointed the Health and Safety Service as its 'competent person' as defined by the Management of Health and Safety at Work Regulations 1999.
- The specific arrangements adopted will be guided by the Health and Safety Service's Health and Safety Guidance Notes.
- To receive relevant Health and Safety reports.
- To nominate and appoint a Health and Safety Governor.
- To carry out an annual site inspection.

### The Duties of the Head Teacher

The Head Teacher has day-to-day responsibility for health and safety management and will take all reasonably practicable steps to secure the health and safety of pupils, staff and others using the school premises or participating in school sponsored activities.

In particular, the Head Teacher will:

- Ensure that suitable and sufficient risk assessments of work activities are undertaken, that a written record of the significant findings of these assessments is kept and that these assessments are subject to regular review.
- Cooperate with the Governing Body to ensure that this policy and its associated arrangements are implemented and complied with.
- Communicate the policy and other appropriate health and safety information to all relevant people including contractors.
- Report to the Governing Body on health and safety performance and to monitor both compliance with, as well as the effectiveness of, this policy.
- Ensure that the premises, plant and equipment are maintained in a safe and serviceable condition.
- Report to the Governing Body any significant risks or policy requirements which cannot be met within the establishment's budget.
- Identify the training needs of staff and hence ensure that they are competent to carry out their roles and are provided with adequate information, instruction and training.
- Ensure consultation arrangements are in place for staff and their trade union representatives.
- Monitor purchasing and contracting procedures to ensure health and safety is included in specifications and contract conditions.
- Receive reports from enforcement officers and advisory bodies and, where appropriate, take relevant actions to address issues raised.
- Promote a positive health and safety culture by leading by example.

Whilst overall *responsibility* for health and safety cannot be delegated the Head Teacher may choose to delegate certain *tasks* to the Health and Safety Coordinator.

The role of Health and Safety Coordinator for the School has been delegated to the School Business Manager.

### **The Duties of the Health and Safety Coordinator**

The Health and Safety Coordinator has the delegated task of assisting the Head Teacher discharge their duties in relation to day-to-day health and safety management.

To do this the Health and Safety Coordinator will:

- Coordinate and manage the risk assessment process for the school building and grounds.
- Coordinate general workplace monitoring inspections and performance monitoring processes and report findings to the Head Teacher and Governing Body.
- Coordinate records of external inspections and maintenance to plant or facilities and ensure that remedial actions identified are either addressed without delay or brought to the attention of the Governing Body if funds are not available.
- Assist with the identification of training needs.
- Collate accident and incident information and, when necessary, arrange for accident and incident investigations.
- Arrange annual health and safety audits and liaise with the Head Teacher and Governing Body in relation to findings and any associated remedial actions.
- Keep the inventory of hazardous substances.

### **Duties of Teaching Staff**

- Ensure whole school risk assessment procedures are followed for all risk assessed activities undertaken by pupils, both on site and off site. Obtain necessary authorisation from SLT before risk assessed activities are undertaken.
- Undertake individual child risk assessments.
- Undertake individual hydrotherapy pool risk assessments.
- Put in place Personal Emergency Evacuation Plans for those pupils who require one.
- Ensure appropriate safe working procedures are brought to the attention of staff within their classroom.
- Take appropriate action on health and safety issues referred to them, informing member of SLT if they are unable to resolve them themselves.
- Report any health and safety concerns in their classroom or area of the school to the Head Teacher.
- Report promptly any accidents (including near misses) which occur in their class or area of the school so that the matter can be investigated, following the accident reporting procedure.
- Where a contractor, agency worker or volunteer is delivering a service directly involving a pupil, the Class Teacher is responsible for ensuring that all safety requirements are followed.

### **The Duties of all Members of Staff**

Under the *Health and Safety at work Act etc 1974* all employees have general health and safety responsibilities. All employees are obliged to take care of their own health and safety

whilst at work along with that of others who may be affected by their actions. This also applies to volunteers who are under the control of the school.

Specifically, all employees have responsibility to:

- Take reasonable care for the health and safety of themselves and others in undertaking their work.
- Comply with the school's health and safety policy arrangements at all times.
- Report all accidents and incidents in line with the reporting procedure.
- Not intentionally interfere with or misuse any equipment or fittings provided in the interests of health, safety and welfare.
- Report all defects in the condition of premises or equipment and any health and safety concerns immediately to their line manager.
- Ensure that they only use equipment or machinery that they are competent / have been trained to use.
- Make use of all necessary control measures and personal protective equipment provided for safety or health reasons.

### **Pupils**

Pupils, in accordance with their age and aptitude, are expected to:

- Exercise personal responsibility for the health and safety of themselves and others.
- Observe standards of behaviour and dress consistent with safety and/or hygiene.
- Observe all the health and safety rules of the school and, in particular, the instructions of staff given in an emergency.
- Not wilfully misuse, neglect or interfere with facilities or equipment provided for their and others' health and safety.

### **Contractors**

All contractors who work on the school premises are required to identify and control any risks arising from their activities and inform the Head Teacher of any risk that may affect the staff, pupils and visitors.

All contractors must be made aware of their responsibilities contained in this policy and the associated emergency procedures and comply with these requirements at all times.

In instances where the contractor creates hazardous conditions and refuses to eliminate them or take measures to make them safe, the Head Teacher will take such actions as are necessary to prevent staff, pupils and visitors being put at risk from injury.

## **SECTION 3: ARRANGEMENTS**

### **Risk Assessment**

The underlying process which informs safety management is risk assessment. Risk assessments are of two kinds - activity/area risk assessments and pupil risk assessments. In addition, where appropriate, Going Out Forms are completed giving information pertaining to arrangements for the day/trip/activity.

#### *Activity/area risk assessments*

Assessments of significant risks will be made with those persons responsible for the activity/area affected and the significant findings of these decisions will be recorded in

writing. Such risk assessments will be guided by the model risk assessments provided by the Health and Safety Service, but will be tailored to the specific circumstances and risks of the school. The following activity/area risk assessments are required.

- RA22 - Whole School - this will encompass all other required Risk Assessments
- RA03 – All Building & Site Safety
- RA05 - COSHH
- RA08 – Fire Safety
- RA09 – First Aid Needs/Provision
- RA11 – Food Tech Room
- RA13B – Working Alone in Premises
- RA26 – Swimming/Hydrotherapy Pool Safety
- RA27 – Working at Heights
- RA28 - Work Experience
- RA29 – Driving on DCC Business

Risk assessments are disseminated in accordance with the Procedure for the Dissemination of Information from Policies, Risk Assessments and Other Procedures. Risk assessments are available for all staff to view and are held centrally in the School Business Manager's office. Wherever possible, affected staff will be included in the risk assessment process. Staff and other affected parties will be briefed in the risk assessment findings.

Required risk assessment records will be reviewed at least annually, but also whenever a change is made to the building or relevant working systems. This will be identified on the risk assessment record. Updated risk assessments will be ratified by the Governing Body.

For full details relating to risk assessment arrangements, reference should be made to the HS0047 Guidance Note.

#### *Pupil risk assessments*

Before any pupil is permitted to take part in any activity which potentially exposes them to a raised level of risk (e.g. out of school visits, use of specialist equipment or facilities) a risk assessment will be carried out stating the basis on which that child can be permitted to participate in that activity safely. It is the responsibility of the relevant class teacher to carry out pupil risk assessments, and to record them on the child's or class risk assessment. In addition, teachers will carry out individual hydrotherapy pool risk assessments. In carrying out pupil risk assessments, class teachers shall have due regard to the HS0046 Guidance Note.

#### *Other arrangements in alphabetical order:*

#### **Accident/Incident Reporting**

Employee, pupil, contractor and visitor accidents relating to the workplace or premises will be entered onto the OSHENS online accident reporting system. All accidents involving staff, and any accident to pupils and others which is work related, in that it has arisen out of a material defect or organisational failure, will be reported to the Governing Body by the Headteacher. Parents / carers will be notified immediately of all major injuries.

Minor injuries sustained by pupils will be recorded on the Accident Report to Parents Form and recorded on CPOMS.

The Health and Safety Coordinator is responsible for ensuring that all accidents are investigated and that any recommended remedial steps to avoid similar instances recurring are implemented or brought to the attention of the Governing Body if funds are not available.

All accidents which fall within the scope of the Reporting of Diseases Injuries and Dangerous Occurrence Regulations 2013 will be reported to the HSE via the OSHENS online accident reporting system. This will be undertaken by the Health and Safety Service.

For full details relating to accident reporting arrangements, reference should be made to the HS001 Guidance Note.

### **Communication and Training**

Detailed guidance and information about health and safety issues can be found in the Health and Safety Service's Guidance Notes which are located in the OSHENS Document Library. The Health and Safety Service also provide competent health and safety advice for school staff and can be contacted on 01392 382027 or on [healthandsafety@devon.gov.uk](mailto:healthandsafety@devon.gov.uk).

The Health and Safety Law poster is displayed in various areas around the school.

#### *Health and Safety Training*

All employees will be provided with:

- induction training in the requirements of this policy
- updated training in response to any significant change
- training in specific skills needed for certain activities as identified by the relevant risk assessment
- refresher training where required.

Each member of staff is also responsible for drawing the relevant line manager's attention to their own personal needs for training. They should not undertake duties unless they are confident that they have the necessary competence. All employees shall undertake work tasks as instructed and trained.

For full details relating to staff training, reference should be made to the HSA0055 Training Guidance Note.

### **Consultation**

Consultation on day to day matters will be achieved through daily teacher and TA briefings, weekly teacher and TA meetings, half termly class meetings and through emails to staff. Staff are represented on the Governing Body, to which the Governing Body has delegated oversight of health and safety issues.

Members of staff with concerns should raise them initially with the Health and Safety Coordinator. If required, requests for external advice should then be sought from the Health and Safety Service for concerns of employees which cannot be resolved locally.

Staff should feel free to contact the appropriate trade union appointed Safety Representative. The Governing Body welcomes the support of trade unions in health and safety matters.

For full details relating to staff consultation, reference should be made to the HS008 Guidance Note.

### **Contractors**

All contractors must report to Reception where they will be asked to sign in and wear an identification badge. The School Business Manager is responsible for ensuring that appropriate competency checks are carried out before contractors are engaged. The Health and Safety Coordinator is responsible for ensuring that contractors are appropriately briefed about site-specific health and safety matters relevant to their duties.

In respect of construction work, NPS will be asked to advise on which contractor to approach to carry out specific works.

Where a contractor, agency worker or volunteer is delivering a service directly involving a pupil, the Class Teacher is responsible for ensuring that all safety requirements are followed.

### **Display Screen Equipment (DSE)**

All staff who use computers daily for continuous spells of an hour or more, or a total daily time of 3 hours or more will have a DSE assessment carried out. This will be achieved by completing the OSHENS DSE online training and assessment.

Staff identified as DSE users are entitled to an eyesight test for DSE use every 2 years by a qualified optician and corrective glasses (if required specifically for DSE use) subject to a total cost of £45.00.

For full details relating to DSE, reference should be made to the HS0012 DSE Guidance Note.

### **Fire and Emergencies**

The Head Teacher is responsible for ensuring that the fire risk assessment is undertaken using the RA08 document and controls implemented accordingly. The fire risk assessment is located in the School Business Manager's office and is reviewed annually.

Fire and emergency evacuation procedures are detailed in the Fire Emergency Plan document which is located in Reception and in the School Business Manager's Office. Fire Emergency Evacuation Protocols are displayed around the school: in the main entrance, all classrooms and catering room and it is also emailed to all staff. All staff will be briefed on the contents of this plan at induction and on an annual basis. This will be augmented by fire drills which will be undertaken termly. Evacuation procedures are also made known to all contractors / visitors.

The Head Teacher is responsible for ensuring that the school's Fire Log is kept up to date.

Procedures for other critical incidents and off-site emergencies are contained within the School's Emergency Management/Business Continuity Plan which will be reviewed annually. Hard copies are located at the homes of the Head Teacher, the School Business Manager, the Chair of Governors, and in the SBMs Office. An electronic version is stored on the admin (F) drive, backed up by SCOMIS.

For full details relating to fire safety, reference should be made to the HS0018 Fire Safety Guidance Note.

If alarms are sounded out of normal school hours, the First Responder is Bicton College Duty Warden. Second responder is the Head Teacher. Details of Key Holders are recorded with Advanced Security Alarm Protection. In addition, the School Business Manager holds a set of keys but is not a responder.

Personal Emergency Evacuation Plans (PEEPs) are produced by Class Teachers and are reviewed at least annually or more frequently if required. PEEPs are held on the (G) drive.

### **First Aid**

Mill Water School is deemed to be a medium risk site. The school is fairly remote and is approximately a 20 minute journey for emergency vehicles. Eleven staff have a first aid qualification. Eight of these have a paediatric first aid qualification. There are four wall mounted first aid boxes, plus mobile first aid kits in every classroom, kitchen area and school vehicle.

The Head Teacher is responsible for assessing the need for first aid provision and for ensuring that there are sufficient, suitably trained staff. A list of trained staff is held at Reception, in the pool area, in the senior corridor and in the Food Tech Room, next to the four wall mounted first aid boxes. The Headteacher is responsible for nominating a member of staff to maintain the contents of first aid boxes.

The PA to the SLT is responsible for

- maintaining a record of those with first aid training
- organising refresher training as required.

The SEND Assistant is responsible for maintaining the first aid boxes

Full details relating to First Aid provision are contained in the First Aid Risk Assessment RA09.

For full details relating to first aid, reference should be made to the HS0019 First Aid Guidance Note.

### **Hazardous Substances**

The Health and Safety Coordinator is responsible for ensuring that where hazardous substances are used in any activity, the Health and Safety Coordinator:

- keeps a complete and up-to-date inventory of those substances
- obtains the appropriate Safety Data Sheets for those substances
- carries out risk assessments to identify safe working methods and appropriate emergency procedures
- keeps all chemicals appropriately and securely stored out of the reach of children
- keeps all chemicals in their original packaging and never decanted into unmarked containers.



For full details relating to the control of hazardous chemicals, reference should be made to the HS0010 COSHH Guidance Note.

### **Hydrotherapy Pool**

The arrangements for the safe use of the hydrotherapy pool are detailed in the Pool Safety Operating Procedure (PSOP) which includes the Normal Safe Operating Procedure (NSOP) and Emergency Operating Procedure (EOP), and the Hydrotherapy Pool Risk Assessment (RA26). The PSOP will be displayed at all times in the pool area. The Golden Rules and Roles and Responsibilities for key members of staff will also be displayed in the pool area. All staff will be trained in the use of the pool, will have read the PSOP, including NSOP, EOP and RA26, prior to working in the pool area. All pupils using the hydrotherapy pool will have an individual hydrotherapy pool risk assessment and individual swimming programme developed by the Class Teacher. These documents refer explicitly to pupil:staff ratio.

Session Leaders must complete a Hydrotherapy Session Form prior to use. This must be authorised and signed by a member of the SLT/ELT.

The arrangements for the maintenance of the hydrotherapy pool are outlined in the Hydrotherapy Pool Maintenance Procedure which can be found in the School Business Manager's office. A copy will be displayed in the Pool Plant Room. Maintenance will be carried out by the trained Teaching Assistant and ISCA Pools.

The Health and Safety Coordinator is responsible for ensuring that Pool Safety Procedures are updated as required.

### **Legionella and Water Compliance Checks**

Regular water compliance checks are covered by a service level agreement with Churchill Environmental Services (CES). CES ensure that identified operational controls are being conducted and are recorded in the Water Compliance Log Book.

#### *CES*

- Supply and maintain comprehensive water hygiene log book for monitoring and management of the water system
- Monthly visit for monitoring and management of water systems
- Monthly temperature monitoring of storage, flow and return of water heaters
- Monthly bacterial sample from hydrotherapy pool to test for TVC, Coliforms, E-Coli, Pseudomonas
- Quarterly Legionella sample from hydrotherapy pool
- Six monthly temperature monitoring of the incoming main
- Annual temperature monitoring of a representative number of non-sentinel hot and cold outlets
- Annual visual inspection of water quality discharged from water heaters drain valve
- Annual visual inspection of internal condition of cold water storage tanks.

The School Handyman is responsible for:

- Weekly tap checks and flushing
- Monthly temperature monitoring of sentinel hot and cold outlets
- Quarterly cleaning, descaling and disinfection of shower heads and hoses and spray outlets

All records are held in the School Business Manager's office.

For full details relating to the control of legionella, reference should be made to the HS0028 Legionella Guidance Note.

### **Lettings/shared use of premises**

The School Business Manager is responsible for ensuring that all hirers/tenants are appropriately briefed on health and safety matters relevant to their use of school premises, and that they have suitable and sufficient public liability insurance. The hirer/tenant will be required to provide a copy of their risk assessment where their activities present a significant hazard either to the building itself or to the safety or health of the occupants within it.

There is currently no letting or shared use of the premises.

### **Maintenance of Plant and Equipment**

The Health and Safety Coordinator is responsible for ensuring that regular inspection and testing of school equipment is conducted to ensure that work equipment is maintained in a safe and efficient state, and for keeping appropriate records of such inspection and testing. All staff are required to report any problems found with plant/equipment to the School Business Manager using the Health and Safety Requisition Form. Defective equipment will be clearly marked and taken out of service by storing in a secure location pending repair / disposal.

The following specific statutory inspections and tests will be undertaken by IJ Cannings & Sons Ltd:

- Annual gas appliance inspection and maintenance
- Annual gas/fixed heating plant inspection and maintenance
- Annual gas tightness test
- Electrical installation inspection every 5 years
- Annual inspection of electrical systems in the Hydrotherapy Pool

### *Portable Electrical Appliances*

Staff must not use electrical equipment which they consider, based on visual inspection or otherwise, may be defective. Defective or possibly defective equipment will be reported to the School Business Manager.

All portable items of electrical equipment will be subject to formal inspection and, where appropriate, a testing regime on an identified cycle dependent upon the level of risk associated with the particular appliance type. This inspection and testing will be carried out by IJ Cannings & Sons Ltd.

Personal items of equipment should not be brought into the school without prior authorisation and must be subjected to the same inspection process as school-owned equipment.

For full details relating to work equipment and electrical safety, reference should be made to the HS0016 and HS0058 Guidance Notes.

### **Medication Arrangements**

Arrangements for medication are detailed in the separate Administration of Medicines Policy, which is reviewed annually by the SEND Assistant, with advice from the School Nurse. A copy of this policy can be found in the main admin office.

All pupils who need a Medical Care Plan will be identified by the SEND Assistant, with advice from the school nurse, who will ensure that the Plan is in place and shared with relevant staff. This list will be reviewed annually by the School Nurse and updated as appropriate.

For full details relating to the administration of medication, reference should be made to the HS0032 Medication Guidance Note.

### **Monitoring**

The Head Teacher will put in place procedures to monitor compliance with the arrangements described in this policy. The central component of this process is the annual Health and Safety Review process undertaken by the Health and Safety Service. Feedback from this process is to be referred to the Governing Body. Following receipt of the Health and Safety Review, the Governing Body will feedback to the Full Governing Body. In addition, SLT will carry out Health and Safety Focussed Monitoring every term and report findings to the Head Teacher and Health and Safety Coordinator.

The Health and Safety Coordinator is responsible for ensuring that a general inspection of the site is conducted each half term using the DCC Building and Site Premises Safety Inspection Checklist. Feedback from this process is to be referred to the Governing Body.

The Governing Body is responsible for defining such other monitoring arrangements as it considers necessary to provide assurance that the requirements of this policy are being met. This may include requiring summaries of findings from formal maintenance reports, training audits, accident book review and any other items considered necessary.

For full details relating to monitoring, reference should be made to the HS0005 Audit and Monitoring Guidance Note.

### **Moving and Handling**

All manual handling tasks are subject to risk assessment. Staff engaged in these activities will be provided with information on safe moving and handling techniques and will receive specific training where the need is identified in the risk assessment.

Where a member of staff has significant moving and handling responsibility, they will receive specific training.

All moving and handling of pupils will be risk assessed by the physiotherapy staff or school nurse and recorded in a specific Moving and Handling Plan for the individual concerned. The format found in the HS0035 Guidance Note will be used. All staff who move and handle pupils will receive appropriate training both in the controls listed in the Moving and Handling Plan and specific training on any lifting equipment that they may be required to use. Staff training in Moving and Handling will be recorded on the Whole School Training Record which is kept by the PA to SLT.

The school has a Moving and Handling Policy which should be referred to.

For full details relating to moving and handling, reference should be made to the HS0034/35 Moving and Handling Guidance Notes.

### **Offsite Visits**

In line with the *Outdoor Education, Visits and Off-site Activities Health and Safety Policy*, the DCC Educational Visit Adviser will be notified of all Category B and C visits via the *Evolve* online system.

For lower risk Category A visits, the School's Educational Visits Co-ordinator, Andy Pratt, will check the documentation and planning of the proposed activity and initially approve the visit before referring to the Head Teacher/ELT for final approval.

For full details relating to educational visits, reference should be made to the *Outdoor Education, Visits and Off-site Activities Health and Safety Policy 2018*.

### **Personal Safety and Security**

The school believes that staff should not be expected to put themselves in danger and will not tolerate violent / threatening behaviour to its staff. A separate specific Behaviour Management Policy is in place at the school.

Staff will report any such incidents on the OSHENS system in accordance with agreed accident/incident reporting procedures.

Working alone will be avoided wherever practicable. No high risk tasks will be carried out by lone workers. Work carried out unaccompanied or without immediate access to assistance will be risk assessed by the Head Teacher or, in the case of the Head Teacher, by the Chair of Governors, in order to identify and implement control measures. The requirement to undertake a lone working risk assessment will also extend to working alone off-site where staff conduct home visits.

Such risk assessments will be reviewed annually or after significant change and recorded by amending the RA22 Risk Assessment.

### **School Security**

The Head Teacher is responsible for undertaking a risk assessment for site security in order to identify and implement control measures in this area. This will be reviewed annually or after significant change and recorded by amending the relevant section of the RA22 risk assessment document.

For full details relating to security and lone working issues, reference should be made to the HS0031 Lone Working and HS0050 Security Guidance Note.

### **Stress/Wellbeing**

The school is committed to promoting high levels of health and well-being and recognises the importance of identifying and reducing workplace stressors through risk assessment in line with the HSE's management standards.

Return to work meetings are held following absence and we participate in the Employee Assistance Programme. Mentoring is available if required and is put in place as and when needed. In addition, staff will be referred to IMASS where Health and/or well-being issues require clarification.

Where appropriate, risk assessment findings will be recorded on the RA25 document.

For full details relating to staff wellbeing, reference should be made to the HS0024 Health Issues for Staff Guidance Note.

### **Work at Height**

Work at height will be avoided wherever possible. Work carried out at height where a significant injury could result will be risk assessed by the School Business Manager in order to identify and implement control measures. Staff who work at height will be briefed on risk assessment findings. When working at height (including accessing storage or putting up displays) appropriate stepladders or kick stools are to be used. Staff *must not* climb onto chairs. Any work required to be carried out on the roof of the school is undertaken by staff from Bicton College trained in this.

For full details relating to the control of work at height, reference should be made to the HS0060 Work at Height Guidance Note.

### **Work Experience**

If the school hosts a work experience placement, this will not begin until a Risk Assessment has been completed by the student's own school or college. Any significant hazards within the planned work tasks will be risk assessed and findings will be communicated to the student and their parents/guardians via the student's school. This assessment will be recorded on the RA28 risk assessment document.