



**OXFORD
International
College**

A NORD ANGLIA EDUCATION SCHOOL

HEALTH AND SAFETY POLICY

POLICY INTENDED FOR:	Staff, Students, Contractors and Visitors
CATEGORY:	Operations
POLICY IMPLEMENTED BY:	Principal
POLICY MONITORED BY:	Health and Safety Officer
REVIEWED BY:	Director of Operations
CONSULTATION WITH:	Senior Leadership Team (SLT)
REVIEWED DATE:	August 2026
FUTURE REVIEW:	August 2027

The Three Pillars

The three pillars of Oxford International College (OIC) are:

- Academic Excellence
- Personal Development
- Career and University Pathways

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HEALTH AND SAFETY POLICY STATEMENT

Important: All employees must read this statement and be familiar with the College's policies.

It is the policy of the College to comply with the obligations under the Health and Safety at Work Act 1974 (as amended), the Management of Health and Safety at Work Regulations 1999 (as amended), HSWA1974 Section 2 & 3, Management of H&S at work Regulations 1999 regulation 7, RIDDOR 2013 guidance for Schools and Regulatory Reform (Fire Safety) order 2005 and other supporting legislation concerning Health and Safety. At all times the College will provide and maintain a healthy and safe working environment for its employees as well as to take steps to protect the health and safety of all visitors to the College, including contractors from other firms and temporary workers, as well as any members of the public who might be affected by our operations.

The overall objective of the College's health and safety policy is to minimise the number of instances of occupational accidents and illnesses. The ultimate objective is not to have any such instances. They will do all that is reasonably practicable to ensure the health and safety of its employees, however, health and safety at work is the responsibility of each, and every individual associated with the College. Everyone requires constant vigilance and concern for the welfare of others.

It is also the duty of each employee to take reasonable care of his or her own welfare and to report any situation, which may pose a threat to the well-being to himself or herself or any other person. Such hazards in the workplace such as frayed electrical cables, dangerously defective equipment, unsafe structures, possible fire risks, loose floor tiles etc should be reported as a matter of routine and no member of staff will be penalized for complaining if such hazards are not rectified by the management or designated safety manager. It is therefore every worker's responsibility to report immediately any situation that could endanger the well-being of them or others and the reporting of injuries, however small, sustained by a person at work must never go unrecorded. Accident records are crucial to the effective monitoring and revision of the College policy and must therefore be accurate and detailed.

The College believes that the success of its Health and Safety Policy can only be achieved through the cooperation of all staff. Experienced employees must have due regard for inexperienced employees by not allowing less experienced workers, especially young workers, to unknowingly put their health and safety at risk. Likewise, an inexperienced worker (despite prior training) or untrained worker should not attempt to do hazardous work if they do not feel competent or have not been trained for such work. If any inexperienced or untrained worker is in any doubt about the health and safety risks of a particular task, they should refrain from continuing with the task and inform their immediate supervisor or the Health & Safety Manager. Employees will be provided with adequate equipment, information, training, and supervision to provide for their personal health and safety and that of others.

The College's Health and Safety Policy will be continually monitored, and improvements will be implemented from time to time. The College invites all employees to put forward any complaints against or suggestions to improve the Health and Safety Policy either informally or in writing directly to the designated Health & Safety Manager.

HEALTH AND SAFETY POLICY OF THE COLLEGE

Important: all employees must make themselves familiar with this policy

DESIGNATED MANAGERS AND RESPONSIBILITIES

The person with Board responsibility for Health and Safety at the College:

Name: Richard Davies
Title: Chair of Governors
Contact address: Oxford International College 1-5 London Place Oxford OX4 1BD

The person with responsibility for ensuring compliance with Health and Safety at the College:

Title: Principal
Address to write to: Oxford International College, 1-5 London Place, Oxford, OX4 1BD

The person with overall responsibility for delivering Health & Safety measures and processes at the College is the Health & Safety Manager of the College:

Name: Health and Safety Officer
Address to write to: College.Support@oxcoll.com

First aid kits are supplied at all science facilities as well as the following locations to ensure appropriate and full coverage based on risk

DEPARTMENT	LOCATION OF FIRST AID KIT
1-5 London Place- All departments	Reception, ground floor; Medical room 3rd floor
Alice House	Reception and House Parents Lodgings
St Clements	Staff Office, Kitchen
Wavy Gate	Reception and kitchen

Key personnel trained in first aid are as follows (An exhaustive list is available from the HSO):

PERSON	Location
Jenny Bourlakis	London Place
Teresa Clack	Boarding houses
Clem Corrin	Wavy Gate
Erick Soasti	London Place and St Clements
Rebecca Pocso	Alice House
Dhumi Muchipisi	Alice House
Katherine McMillan	Nurse
Kim Allen	Nurse
Lola Mestre-Lastra	London Place Saturdays
Milan Vukoman	London Place and St Clements
Peter Merrow-Smith	London Place
Robert Jeffreys	London Place
Sarah Outen	London Place
Theo Costello	London Place and St Clements

The College and the roadside frontages of the College buildings are designated as no smoking zones:

DEPARTMENT	AREA
All Departments	Smoking is not prohibited on any and all College premises and within sight of the College buildings including the roadside frontage of any of the College premises. The use of e- cigarettes is also prohibited on all college premises.

The designated Fire Safety Managers of the College and the persons responsible for the maintaining and testing of fire alarms, detection equipment and firefighting equipment is:

Name: Paul Dewberry	
Title: Director of Operations	
Address to write to: College.Support@Oxcoll.com	

Assembly points for fire and emergencies are signed within the facilities and also recorded within the Fire Folder which is kept at the reception of each teaching building and with Boarding House Managers at residential premises. Within all buildings fire notices set out the action to be taken in the event of the fire alarm sounding and this includes the location of the assembly point.

Location of Fire Extinguishers

All Departments	It is the responsibility of each employee and visitor to familiarise him/herself with the location of the fire extinguishers in the vicinity of their location. However, the fire extinguisher should only be used if training has been provided and you are not putting yourself or the safety of others at risk.
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WORKING OFF-SITE ON PREMISES THAT DO NOT BELONG TO THE COLLEGE

If work is carried out on behalf of the College on premises not belonging to the College, employees must be aware that the Landlord of those premises has the overall legal responsibility for the health and safety of all personnel on their premises (such as their own employees, sub-contractors, members of the public). Therefore, employees of the College must be aware of and comply with the Landlords health and safety procedures whilst working on their premises.

Immediate health and safety concerns should be addressed to the Health and Safety Manager. However, if those concerns are not adequately addressed, the employee should contact the College Principal or designated deputy for advice.

Please note, employees are responsible for safe-working practices at all times, regardless of where they work, and should always follow the principles of the College's Health and Safety Policy.

RESPONSIBILITIES OF EMPLOYEES

All employees, irrespective of status, have a personal responsibility with regard to health & safety as follows:

- Be familiar with the College's Health & Safety Policy and with the standards and procedures it contains and to co-operate and implement its contents.
- Understand and comply with all instructions, working procedures and safety rules which apply to their work. Some rules have a general application, such as rules for fire risks and emergencies. Other rules apply to specific jobs and equipment, such as correct use of equipment used for lifting, use of ladders and display screen equipment etc.
- Work with due care and attention at all times. Whilst it is the College's responsibility to provide and maintain the necessary equipment for safe working, equally it is the employee's responsibility to use that equipment properly, and in many cases, there is a legal obligation to do so.
- Not operate tools or equipment unless the employee is trained and authorised to do so and report any defects to the Health and Safety Officer.
- Fire Fighting Equipment must only be operated by competent persons
- Report any hazards seen and, if appropriate, make suggestions for their elimination and control.
- Wear or use personal protective equipment as appropriate or as instructed.
- Ensure their work area and communal areas are kept clean and tidy.
- Develop a personal concern for the safety of themselves and others.
- Report all accidents, injuries, dangerous occurrences and 'near misses' no matter how trivial through the Sphera system.

- Raise any safety matter with the appropriate person.

RESPONSIBILITIES OF THE HEALTH & SAFETY OFFICER

- The Board will ensure that there is an effective policy for health and safety. The College Health and Safety Officer (HSO) has overall responsibility for all health, safety and welfare matters within the operation and the provision of regular reviews to its efficiency and the provision of adequate staff, funds and materials to meet the policy's requirements. The HSO is responsible for the implementation of the NAE health and safety strategy at the College.

The HSO will also ensure:

- The development of a strong health and safety culture
- Responsibility for health, safety and welfare is properly assigned and accepted at all levels.
- Arrangements are made for the provision of suitable and sufficient safety training for all employees.
- Personnel are informed of any relevant changes to health and safety policies and ensure that documents are updated as necessary.
- Chair the Health and Safety Committee
- Health and safety monitoring is regularly undertaken at all College sites.
- Information from suppliers is obtained for the safe use of equipment and materials and that all relevant health and safety information and guidance are provided to employees as required.
- Records of statutory inspections and other appropriate records are maintained.
- Records of injuries and work-related diseases are maintained and undertake appropriate reporting action to RIDDOR and/or HSE if necessary.
- Appropriate resources are allocated to allow for the elimination and/or control of known hazards and to safeguard against the introduction of new risks.
- Sub-contractors' tenders include adequate provision for safe working and comply with any legal requirements and the College's policy.
- Appropriate health and safety arrangements are discussed and managed with clients and building occupiers to ensure compliance.
- Provision of suitable equipment necessary for safe working and ease of handling including the requirements for any specialised safety and storage equipment.
- Provision of any adequate personal protective equipment, safety signs and relevant health and safety documentation.
- Provision of any training including specialised training if required.
- Provision of adequate welfare and first aid facilities.
- Appropriate action is taken in the event of fire or other emergency and the provision of suitable firefighting equipment.
- Protection of the public including students and their families whilst on College premises.
- Risk assessment of potential hazards are undertaken to determine the most appropriate means to minimise the risk, and reviewed as appropriate, record the assessment and to advise staff and students of any significant findings.
- Employees are only allocated work according to their ability and have been given the necessary training to enable them to carry out their work safely.
- All necessary data sheets for hazardous substances are made available to staff and students coming into contact and COSHH assessments are carried out as required.
- Safety equipment and personal protective equipment necessary for a particular task is readily available, used/worn as required and is in good repair.
- Materials are stored safely and that, where appropriate, firefighting equipment is readily available.
- Only trained, competent and authorised personnel use tools and equipment and ensure that young or inexperienced workers are properly supervised.
- Prompt corrective action is taken whenever unsafe acts are noticed or reported to them.
- Cleanliness, tidiness, and other attributes of 'good housekeeping' are of an acceptable

- standard.
- The cause of all incidents/accidents are investigated and reported, including those, which cause minor injury or loss/damage to equipment or materials with no injury and to take appropriate remedial action to avoid re-occurrence.
- Implementing the NAE audit and inspection requirements and program
- Coordinating the provision of health and safety induction/refresher training to all staff
- Identifying the implications of changes in local health and safety legislation or guidance.
- Ensure that H&S actions are effectively managed through the NAE H&S management system, Sphera.

COMMUNICATION AND TRAINING

Communication

The College will ensure that employees are familiar with the contents of the College Health and Safety Policy and will communicate with employees orally, through line managers, and in writing, in the form of directives and this policy.

Co-operation & Care

Employees are expected to co-operate with the Health & Safety Officer and to accept their duties under this policy. Disciplinary action may be taken against any employee who violates safety rules or who fails to perform his or her duties under this policy.

Safety Training

Safety training is essential for all effective health and safety procedures. All staff will be trained in safe working practices and procedures relevant to their duties. Training will be provided through the IHasco software program and through job specific inductions. Training will also include advice on the use and maintenance of personal protective equipment and fire equipment, if applicable.

Training sessions will be held as often as is deemed necessary. Also, employees can raise health and safety concerns with their line manager or directly with the Health & Safety Manager at any time.

INSPECTIONS IN THE WORKPLACE

The College will comply with the Workplace (Health, Safety & Welfare) Regulations 1992 (as amended).

This requires regular inspections of the workplace from time to time. Inspections will be of a routine nature or as a result of an event or a planned change in working procedures. Inspections will always provide the opportunity to review the continuing effectiveness of safe working practices and therefore implement changes where necessary.

CONTROL OF SUBSTANCES HAZARDOUS TO HEALTH (COSHH) – POLICY AND PRECAUTIONS

COSHH Policy

The College will comply with the Control of Substances Hazardous to Health Regulations 2002 (COSHH)

(as amended). Regularly reviewed risk assessments will be undertaken of all work involving exposure to hazardous substances. The College will ensure that exposure of workers to hazardous substances is minimised and controlled.

Employees who come into contact with hazardous substances will receive training and information on the health and safety issues of these substances. Employees working with hazardous substances must follow the information provided on the Risk Assessment reports and any College procedures relating to the particular substance. If in doubt, the Health and Safety Manager should be consulted.

Substances hazardous to health are regarded as any natural or artificial substances (including micro-organisms), which can be toxic, harmful, corrosive, or irritant to any employees exposed to them.

Chemicals and substances that are stored in chemistry facilities will be listed and held in the fire safety document held at each reception.

In the event of contamination, the employee should find out the substances and its source and, if injury occurs, he/she should contact the First Aid Manager, his/her own doctor or the local hospital (Casualty Department) for treatment without delay.

COSHH Precautions

Under the Control of Substances Hazardous to Health Regulations 2002 (COSHH) (as amended) the following precautions should be taken:

- Handle hazardous substances with care and use the personal protective equipment supplied as it is supposed to be used.
- Make sure you are familiar with the rules (e.g. COSHH) for using substances (refer to COSHH assessments and data sheets).
- Before eating, drinking, and smoking and after handling hazardous substances, ensure that hands are washed.
- Remove lids/stoppers only when the substance is to be used.
- Store highly flammable substances in a lockable fire-retardant cabinet as per manufacturers/suppliers' recommendations.
- Only minimum quantities, required for immediate use, are to be kept in the College.

PERSONAL PROTECTIVE EQUIPMENT POLICY

The College will comply with the Personal Protective Equipment at Work Regulations 1992 (as amended).

This requires that all employees who may be exposed to a risk to their health and safety while at work will be provided with properly fitting, suitable, and effective personal protective equipment or clothing.

All personal protective equipment or clothing provided by the College will be maintained in good working order and all employees provided with such protective equipment or clothing must wear or use such protective equipment properly. Employees must report defective personal protective equipment or clothing to their immediate supervisor or HSM as soon as it is found to be defective.

Employees provided with personal protective equipment will receive training and information on the use,

maintenance, and purpose of the equipment.

OPERATION OF EQUIPMENT AND USE OF LADDERS POLICIES

Operation of Equipment Policy

The College will comply with the law as set out in the Provision and Use of Work Equipment Regulations 1998 (as amended) and will try to ensure that all equipment used in the workplace is safe and fit for purpose. Employees will be provided with appropriate information and training to enable them to use relevant equipment safely and this equipment must only be used by authorised and trained employees.

Work equipment must be maintained in good working order and repair. Employees must report defective equipment to their line manager or the HSM immediately. The employee will also be provided with adequate protection from the work equipment, if it presents a danger when in use (e.g. goggles to protect from dust). This work equipment will be clearly labelled with appropriate health and safety warnings.

Please contact the Health and Safety Manager if your work requires you to use a ladder and please refer to the HSE recommended guidelines for safe use of ladders as per the attached link:

<http://www.hse.gov.uk/pubns/indg402.pdf>

DISPLAY SCREEN EQUIPMENT

The College will comply with the Health and Safety (Display Screen Equipment) Regulations 1992 (as amended).

The risks to users of visual display unit (VDU) screens will be reduced as much as is reasonably practicable.

Employees regularly using VDU screens will be allowed periodic breaks during their work.

Employees regularly using VDU screens are recommended to have eye tests.

VDU screen employees will be given appropriate and adequate training on the health and safety aspects of this type of work.

Further information is available in the guide "Advice for Working with VDUs". If you have any concerns regarding your workstation, please contact the Health and Safety Manager.

Nord Anglia have an Employee Assistance Program. Employees facing challenges may contact the helpline on 0800 088 5484. The helpline is available 24/7/365 and is a confidential service.

PORTABLE ELECTRICAL APPLIANCES

- All electrical equipment (whether fixed or portable) is subject to periodic testing and appropriate records are maintained.

- The correct voltage for tools and equipment must always be used.
- Waterproof fittings must be used for external work.
- Leads must not be allowed to trail, as this may cause a tripping hazard.
- Frayed electrical leads must be repaired or replaced immediately.
- Staff must ensure that they are familiar with any safety instructions (including manufacturers instructions) relating to any equipment before use.
- It is forbidden to interfere with any electrical appliance.
- It is important to check all electrical tools, leads, plugs of any electrical equipment for any defects before use.
- Any obvious sign of irregular operation of electrical equipment should be reported at once to the HSM or the Fire Safety Manager.
- If any electrical appliance is found to be faulty when used, work should cease immediately, the equipment should be decommissioned, and the fault reported to the HSM or Fire Safety Manager as soon as possible.
- It is forbidden to carry out any repairs or fit any plug to an electrical appliance unless authorised to do so.
- No electrical appliance may be connected to an electrical system by any means other than the correct plug or connection.
- The College undertakes an electrical inspection once every five years in accordance with legal requirement. Any significant findings are reported and recommended remedial action is followed up. The College also carry out an annual fixed electrical safety audit recorded in Sphera. This audit provides an in-depth evaluation of the management of electrical safety at the College.

ASBESTOS POLICY

Asbestos dust can kill. It can cause lung damage and cancer. The dust particles that harm are too small to see with the naked eye and the diseases that develop can take many years and there is no known cure. Asbestos can be found in most buildings and is used in asbestos cement products such as sheets, tiles, tanks, gutters, down pipes, decorative finishes, insulation board, fire doors, ceiling tiles, sprayed coatings, insulation and lagging to pipe work and plant, caulking materials, and fire protection materials.

To minimise the risk from asbestos, the College has undertaken an asbestos survey of all its premises in accordance with its legal obligations. The findings are reported by surveyors and any significant findings are appropriately acted upon. The College maintenance staff will undertake routine checks to ensure the continued safety of the College in accordance with the findings of the report.

Reception files contain advice to contractors on the location of asbestos with the advice that risk assessments should be undertaken for any building related projects that might disturb asbestos in situ.

However, if you suspect you have discovered, encountered or disturbed asbestos based material, STOP WORK, inform the HSM and do not recommence this work until further instructions. Make sure your work colleagues are made aware of the hazard of the asbestos.

ENVIRONMENTAL POLICY

The College and its employees have a duty to act responsibly towards staff, students, suppliers and the public with regard to the effect that business operations may have on the environment and will achieve its responsibilities through the following objectives:

- Adhere to any current legislation and where possible, anticipate new requirements and set out new procedures as required.

- Where feasible, purchase from suppliers who share concern for the environment and produce products from sustainable sources.
- Minimise waste from business operations and re-use or recycle where possible.
- Control the level of harmful emissions.
- Promote the use of energy efficient systems on College premises.
- Support organisations who promote environmental protection issues.

The College will continue to monitor, evaluate and improve its performance whilst promoting environmental awareness to employees.

FIRE SAFETY REGULATIONS

Fire risk assessments

Fire risk assessments will be undertaken and regularly reviewed as required under the Regulatory Reform (Fire Safety) Order 2005. Also, employees must bring to the attention of the HSM or the Fire Safety Manager any potential fire risks that they may become aware of.

A fire risk assessment is undertaken annually by the Fire Safety Manager and external auditors are contacted as required. Fire safety self-assessments are mandatory to be undertaken and recorded in Sphera. Sphera provides a recording and check sheet facility for the management of annual, termly and weekly reporting of fire checks.

Any recommendations and significant findings are reported and followed up.

Reducing Fire Risk

Prevention is better than cure when it comes to fire safety and one of the most important areas of fire prevention is to minimise and/or isolate combustible materials as follows:

- Highly inflammable liquids such as oils, fuels and paints or other inflammable material, must be removed from the College premises when not in use or securely stored in appropriate closed metal containers within a properly designed storage facility well away from sources of ignition. Use must be kept to a minimum.
- Gas leaks are a potential source of fire or explosion, and the detection of a gas leak must be reported **immediately** to the HSM or the Fire Safety Manager. All equipment with gas taps including gas bottles not in use should be constantly checked to ascertain that the gas taps are turned off and not leaking.
- Any waste such as paper waste and other waste such as oily rags must not be allowed to accumulate and must be disposed of in appropriate containers.
- Smoking is not allowed on college premises or on the pavement and roadside frontage within sight of any of the College buildings.
- Faulty electrical equipment is a common source of a fire and should be switched off when not in use. Any observable defect should be reported **immediately** to the HSM or the Fire Safety Manager.

Fire Safety Manager

The College's fire safety policy and procedures take account of special fire hazards in specific areas of the workplace with, if possible, the cooperation and advice from the local fire service.

The Fire Safety Manager has the overall responsibility for the College's fire safety and emergency policy and training. All line managers are responsible for implementing the policy and all staff are responsible for carrying out the instructions of the policy.

It is the College's expectation that all Students are responsible for adhering to this policy.

General Fire Safety and Emergency Policy

All personnel associated with the College must familiarise themselves with this general fire safety and emergency policy and follow the procedures below.

If there is any doubt that a fire cannot be extinguished immediately without risk or injury to individual persons, all employees and students must immediately operate the nearest fire alarm call point, evacuate the building by the nearest and safest exit and report any fire to the local fire service (dial 999)

Employees and students must conduct their operations in such a way as to minimise the risk of fire and combustible materials must be separated from ignition sources. In particular, no one is allowed to smoke on the College premises or near combustible materials in the vicinity of the College.

Emergency evacuation procedure for disabled employees, students and visitors and anyone who requires assistance to evacuate.

In compliance with the Equalities Act 2010, the College has a specific evacuation procedure for disabled employees, students, and visitors. Where a risk assessment identifies the requirement, a Personal Emergency Evacuation Plan (PEEP) will be undertaken by the Health and Safety Officer with support from the Nurses and the Line Manager of the person.

- Where possible disabled employees, students and visitors shall be accommodated on the ground floor
- On arriving at the building, they will be advised of the appropriate route to safely exit the building
- They will be advised not to use a lift in the event of an emergency
- If appropriate the HSO will appoint two able bodied persons to assist in their safe evacuation
- The HSO will be advised of a disabled employee, student or visitor to ensure that a specific check can be undertaken to ensure that the disabled person will be able to evacuate the building in the event of an emergency
- If a Personal Evacuation Plan (PEEP) is required, this should be discussed with the Facilities Manager and will be reviewed regularly.

Fire Detection Equipment

Smoke detector alarms and general fire alarms are located at points throughout the workplace. Employees must familiarise themselves with the location of such detectors and alarms. Upon the discovery of a fire or if a smoke detector alarm sounds, employees must operate the nearest fire alarm call point and evacuate the building immediately.

General Fire Alarm

The sounding of the general fire alarm is the signal that the building must be evacuated. The alarm may be raised for a fire or any other dangerous situation such as an unsafe structure, a gas leak, a bomb scare, and no employee must assume that a situation is not serious because there are no visible signs of an emergency in their immediate locality. When the general alarm sounds all persons must leave the building by the nearest available exit and assemble at the designated assembly point. Employees must also order visitors to the College, including contractors from other firms and temporary workers, as well as any members of the public to leave the building by the exit routes. Where possible, employees should close windows to their offices and doors as they leave.

Other Emergency Procedures in the Absence of an Alarm Sounding

In the absence of the alarm sounding, line managers will warn employees, students or members of the public in the case of a fire or other dangerous situation being detected by word of mouth, to evacuate the premises. They may order evacuation in the case of a fire or any other dangerous situation such as an unsafe structure, a gas leak, a bomb scare, and no employee/student must assume that a situation is not serious because there are no visible signs of an emergency in their immediate locality. Immediately supervisors give instructions all persons must leave the building by the nearest available exit and assemble at the designated assembly point. Employees must also order visitors to the College, including contractors from other firms and temporary workers, as well as any members of the public to leave the building by the exit routes.

N.B. Employees must be aware of any person that may need assistance to leave the premises and that people using toilets or other ancillary rooms may not be aware of the emergency.

Fire Escape Routes

All specified means of escape, for the site premises, must be properly maintained and it is essential that they are always kept free of obstruction. Failure to comply with this could result in disciplinary action being taken.

It is essential that all personnel are familiar with the means of escape and the route to be followed in case of fire. Under no circumstances should fire exit doors be used for general access and fire doors should be kept always shut. The lift should not be used during an emergency or fire drill.

Fire and Evacuation Emergency Procedures

It is the duty of ALL personnel to familiarise themselves with the general fire and emergency procedures above. If working outside of normal College hours (evening and weekends), the additional fire and emergency procedures should also be followed. When working on off site, staff should request the information they require from the client's Health and Safety Manager.

It is the responsibility of the Fire Safety Manager to ensure:

- The College is clear of people in the event of an evacuation for a fire or other emergency alert, and to be in full knowledge of the types, positions and use of the first aid and fire appliances in their respective areas.

- Designated fire marshals within their control, are aware of the fire drill in their areas and the location of the first aid and fire appliances.
- Designated fire marshals conduct a fire safety tour within their respective areas of responsibility from time to time.
- Fire safety and emergency practice drills are conducted at least on a termly basis, one of which will be at night for residential properties.

Discovery of Explosives, Bombs, Suspicious Packets

- DO NOT touch anything suspicious.
- Warn the HSM if appropriate.
- Before leaving, take all necessary measures so that nobody, even mistakenly, comes into contact with the dangerous object before the arrival of the police.

Fire Fighting Equipment

Fire extinguishers are located throughout the workplace. Staff should tackle a fire themselves in the first instance provided their personal safety and the safety of others is not at risk, and they have received appropriate training. If it is not possible to tackle the fire in the first instance the general fire alarm must then be activated. Staff should make themselves familiar with the fire-fighting equipment and alarm call points in the vicinity of their work area.

Fire Doors

Fire doors must never be blocked, jammed, or left open.

Fire Exits

Fire exit doors and corridors must never be locked or blocked or used for general access.

Fire Testing and Drills

Fire alarms systems and equipment are tested regularly under the direction of the HSM by appropriately trained staff. The testing and any significant findings are recorded in a logbook maintained by the Fire Safety Manager. The fire alarm system, emergency lighting, smoke detectors and fire equipment are checked regularly by an independent engineer appropriately qualified for the purpose. Any recommendations are reported and followed up.

Any damaged fire equipment should be reported immediately to the HSM. Call points should only be sounded in an emergency and if set off maliciously this will be treated as a disciplinary matter.

Fire drills are undertaken at least termly (one drill each year will be at night for boarding houses) and are conducted by the HSM or the staff in charge of each boarding houses. The drills and any recommendations are recorded and followed up as required. Staff, students and visitors are required to participate and feedback their experiences to improve future arrangement. No one should return to the building until debriefed and when given permission to do so.

Lifts

Lifts must not be used in the case of a fire or other emergency evacuation.

If anyone is unable to exit the building by means of the stairs due to either a temporary or permanent disability or medical condition, he/she should make this known to the HSM. If necessary, a risk assessment may be undertaken, and a PEEP drawn up as a result.

FIRST AID POLICY AND FIRST AID PROVISION

Statement

OIC provides trained first aid personnel to deal with accidents and injuries at work in accordance with the recommendations of the health and safety authorities. Each OIC site will have in place suitable and sufficient local arrangements to ensure that:

- Sufficient numbers of trained First Aiders meets our first aid needs within the workplace to adequately cover working operations. This includes work outside of standard working hours and weekend working.
- First aid information is communicated effectively.
- A regularly updated list of all First Aiders and their details will be available at each site.

Implementation

A separate First Aid policy is available and should be read in conjunction with this policy.

First Aid Kits

- First aid boxes are provided in every teaching or boarding site to ensure that adequate supplies are available in accordance with the risks at that site.
- All kits are clearly identifiable with a first aid box sign (white cross on green background).
- First aid kits are maintained and restocked, when necessary, by named staff in boarding and reception, and with Science Technicians: a monthly (or after every use) check is undertaken and missing, or out of date items, are requested to the Nurses via email.
- If a casualty has their own medication, the First Aider's role is limited to helping them safely take their own medication.
- Portable first aid kits are provided for any offsite school activity or trip.
- First Aid Treatment can take place in any of these areas:

London Place:	3 rd floor – kitchen unit with adjacent toilet room with sink.	Medical Storeroom
	3 rd floor – room with medical couch and 3 desks	Medical Assessment Room
Boarding Houses • Wavy Gate • St Clements • Alice House •	Bedrooms adapted to make room able to be used as medical room. Each has a bed or couch where patients can lie down to be examined, desk, medical equipment, adjacent toilet room with sink.	Nurses First Aid Room

The first aid box are clearly marked (white cross on green background) and contain sufficient quantities of suitable first aid materials and nothing else. For most First Aid boxes sufficient quantities may be considered as:

- First Aid leaflet

- Resuscitation face shield
- Single use nitrile gloves
- Clothing cutters
- Assorted wash-proof plaster
- Triangular bandage
- Sterile, assorted dressings
- Conforming bandages
- Microporous tape
- Sterile moist wipes
- Burn dressing
- Safety pins
- Sterile eye dressing
- Finger dressing
- Foil blanket

ACCIDENT PROCEDURE, INVESTIGATION AND REPORTING

Accident Procedure

All accidents or injuries must be reported to the immediate supervisor of the relevant department and the HSM and recorded on Sphera.

They must ensure they report, to the appropriate person, any potentially unsafe items of equipment or working situations, as well as all accidents, personal injuries or 'near misses'.

Any accidents and spillages in the Science Laboratory should be dealt with by trained science staff and laboratory technicians only. A spillage kit is provided in the science lab and the First Aid Room.

The employee or the HSM, must record ALL ACCIDENTS, no matter how trivial, by completing the accident form in Sphera.

Under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 – RIDDOR (as amended), employees must report to the HSM any accident at work which results in personal injury and will be encouraged to identify incidents where injury was fortuitously avoided (i.e. near miss accidents).

The HSM will undertake investigation of accidents, initially, and, where practicable, means of preventing a recurrence will be recommended. All serious (reportable) accidents will, additionally, be investigated by the HSM.

Accident Investigation & Reporting

The College will comply with the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR 95). The HSM is responsible for reporting under the regulations. This will entail the HSM or other designated personnel making reports, and the cooperation of all relevant personnel involved is essential to establish:

- The circumstances of an accident or dangerous occurrence or disease.

- The nature and severity of the accident or dangerous occurrence or disease.
- The identity of eyewitnesses.
- The time, date and location of the accident or dangerous occurrence or disease.

Eyewitness accounts for the report will be collected as near to the time of the accident as is reasonably practicable.

The College will study the completed report and will attempt to discover why the accident or dangerous occurrence, or disease happened, and then take action to prevent a recurrence of the accident or dangerous occurrence or disease.

Issues such as liability, proceedings or damages will be assessed following the completed report and, if necessary, the College will take appropriate professional legal advice.

GENERAL OFFICE, CLASSROOM AND BUILDING SAFETY

All staff have a duty to assist in reducing the risk of accidents and fire. The following rules and precautions are to be observed:

- Keep desks tidy and ensure that wastepaper is disposed of regularly.
- Use a safe method of lifting any article and, if necessary, seek assistance.
- Never leave filing cabinet drawers open and never open more than one filing cabinet drawer at a time.
- Ensure that cable and connections on all electrical equipment are sound before use.
- Pay particular attention to windows and report any damaged glazing to the Facilities Manager. Do not lean out of windows or remove any affixed closures. Sash windows situated in first floor rooms and above should not be opened by more than 30cm from the bottom or by more than 10 cm if below waist height. Any concerns should be reported immediately to the HSM.
- Ensure all passageways, stairs and exits are kept clear of any obstruction.
- Ensure all flammables are kept in fire resistant storage.
- All personnel must be familiar with the location and use of the nearest fire alarm call point and firefighting equipment.
- Access to firefighting equipment must never be obstructed and it should never be removed from its housing except when used to extinguish a fire.
- Access to the meter cupboard, lift engine room and science labs is restricted to authorised personnel only. Please contact the Health and Safety Manager if you are unsure of your access rights.
- Bicycles must not be brought into the College buildings. Employees and students must park their bicycles in parking spaces provided by Oxford City Council and do so at their own risk.
- Bicycles must not be chained to the frontage of any of the College buildings as this may cause obstruction to the emergency services, particularly in the event of a fire.

HOUSEKEEPING

Accidents happen more frequently in an uncontrolled or untidy environment. To minimise the risk of accident, a high standard of cleanliness and safe storage of goods and supplies should be maintained. Please report accidental spillages and breakages to the Health and Safety Manager or Facilities Manager to ensure they are handled safely. Regular inspections shall be carried out to maintain optimum standards at all times.

Gas equipment and CO detectors are regularly tested by qualified engineers (at least annually and as required). Water testing is undertaken by qualified personnel and logged. Any significant findings are reported, and appropriate remedial action is undertaken as required. Specialist equipment such as Bunsen burners, fume cupboards and other science laboratory equipment are maintained in accordance with requirements specified in the Science Laboratory Procedures. Staff and students are responsible for reporting any signs of damaged or defective equipment to the HSM.

HYGIENE & HEALTH CONDITIONS

- Paying meticulous attention to good habits in relation to personal body hygiene will greatly help to reduce the spread of diseases and viruses in the workplace. The most important of these good habits is the thorough washing and drying of hands after toilet use.
- If handling food and drink (including tea/coffee making operations) or crockery and utensils used by others (kettles or cups for example), staff should wash their hands before use.
- Staff involved in food preparation should be appropriately trained and students should be adequately supervised.
- Employees should be aware of the danger of the spread of viruses through the use of shared telephone handsets and these handsets should be wiped periodically with a clean damp cloth containing detergent or disinfectant. Where possible use dedicated telephone hand set extensions.
- Staff should ensure that workplaces are adequately lit, well ventilated and adequately heated. Any concerns should be brought to the attention of the HSM or the Facilities Manager.

GENERAL HEALTH AND SAFETY PROCEDURES

All personnel must follow the rules and procedures contained in this policy.

- All personnel must immediately report any unsafe practices or conditions in the workplace to their line manager and the HSM or by raising a hazard alert on Sphera.
- Personnel under the influence of alcohol or drugs are prohibited from the workplace.
- Any act, including horseplay, which might endanger the health and safety of others is strictly prohibited.
- An employee who is unfit due to injury, illness or fatigue will not be allowed to work if the impairment might put at risk the health and safety of that employee or any other persons.
- Employees must not modify, adjust, move or tamper with any electrical equipment or machinery outside the scope of their duties, unless instructed by an appropriately trained member of staff.
- Waste materials, particularly combustible materials, batteries, glassware, light bulbs, photocopier toner, oily rags and laboratory chemicals must be disposed of carefully and in such a way as to not constitute a fire hazard or other hazards. Please consult the Health and Safety Manager or Facilities Manager if you have any concerns regarding the disposal of any waste materials.

- Employees should not undertake a task which appears to affect their personal safety or the safety of others.
- Employees should not undertake tasks that require safety training without receiving this training.
- All injuries must be reported to the line manager of the relevant department and to the HSM.
- Protective guards and safety devices must be properly fitted and used where appropriate. Any defects must be reported to your line manager and the HSM.
- Only authorised employees are permitted to use chemicals in the workplace.
- Employees must wear suitable clothing and footwear at all times, and personal protective equipment must be worn where appropriate.

BUILDING AND PERSONAL SECURITY

- Any unauthorised persons seen entering or on the premises should be reported to Reception immediately.
- Staff and students are responsible for their own belongings and they should ensure they have adequate personal insurance to cover valuable items. Valuable items and bags should never be left unattended.
- The entrance doors should never be left open and security codes for doors with security pads should not be passed on to anyone who is not working or studying at the College.
- A CCTV camera is in place to monitor premises for the purposes of security. The College has a detailed CCTV policy available from the Principal.
- No staff should remain in College teaching buildings after 7.30 p.m. This time is subject to change and could vary between teaching buildings. Staff wishing to remain in the College teaching buildings after 7.30 p.m. must have the appropriate authorisation to do so and should be conversant with the evening fire procedures. No students should be in College after 7.30 p.m.
- Staff working alone on College premises should be conversant with the College's working alone procedures and complete a risk assessment as required. A copy of the risk assessment should be handed to the HSM. A member of staff can request a personal alarm from the H&S Manager if their personal safety is a concern when working alone or travelling to/from work.
- Staff should not bring a visitor into the College without prior consent from the appropriate line manager who will inform the Principal or designated deputy of any such visit taking place. Visitors are expected to report to Reception to collect a visitor's pass, which must be worn at all times, and then returned to reception before leaving. All adult visitors should be accompanied by a member of staff at all times whilst on College premises. There are specific rules for visitors to the student residences and these are available from the Director of Boarding.
- All staff are expected to wear a photo ID lanyard and use this to sign in at each building at the station at reception. If you are concerned about the identity of an adult on the College premises without a badge, please report this to Reception immediately.
- Students will be issued with a photo ID lanyard at induction and this should be carried at all times whilst on College premises. You may ask to check this if you are unsure of the student's identity or report your concern to Reception.

WALKWAYS AND PASSAGEWAYS

- Walkways and passageways must be kept clear from obstructions including trailing wires, ropes, and

- cables wherever possible.
- Walkways or passageways that become slippery should be clearly marked with warning signs until the slippery surface has dried or has been removed.
- Changes in the floor elevation of any walkway or passageway must be clearly marked.
- Long or sharp edges to objects stored in or around walkways or passageways must be covered to avoid injury.
- Warning signs must be placed to identify a hazard that may injure or obstruct persons using the walkway.

MANUAL HANDLING OPERATIONS PROCEDURE

The College will comply with the Manual Handling Operations Regulations 1992 (as amended).

Manual handling operations should be avoided as far as is reasonably practicable where there is a risk of injury.

Where it is not possible to avoid manual handling operations, an assessment of the operation will be made taking into account all factors such as the feasibility of the manual handling operation, the load, the working environment and the capabilities of employees and risk to their safety.

- The lifting of objects should be done by using mechanical devices rather than manual handling where such devices are provided, and the devices should be appropriate for the task.
- The object to be lifted or moved must be inspected for sharp edges and other hazards such as wet or greasy patches, and appropriate steps taken to remove or reduce such hazards.
- If lifting or moving objects with sharp or splintered edges, clean dry gloves must be worn to ensure a firm grip.
- The route over which the object is to be lifted or moved should be inspected to ensure that it is free of obstructions or spillage or other hazard.
- Staff should not attempt to lift or move an object which is too heavy, and which might damage their health.
- Where the lifting or moving of an object is to be done by more than one person, one of the persons should be designated as the supervisor of the operation and coordinate the lifting or moving.
- When lifting a heavy object off the ground, a squatting position should be assumed, keeping the back straight and allowing the knees to take the weight of an object rather than the back.

A guide for safe manual handling is available from the HSM and a copy can be obtained from the Health and Safety Manager. Please ensure you are fully conversant with this document before attempting any manual handling operations.

OTHER POLICIES AND PROCEDURES

Policies and procedures related to Health and Safety can be accessed through the Health and Safety Manager

USEFUL CONTACTS

Principal	principal@oxcoll.com
IT Support	ITservicedesk@nordanglia.com
Finance Manager	finance@oxcoll.com
Health and safety matters – Health and Safety Manager	facilities@oxcoll.com
<u>External telephone numbers</u>	
Bury Knowle Health Centre	01865 227788
John Radcliffe Hospital	01865 741166

WORKING PRACTICE AND RESPONSIBILITIES OF CONTRACTORS

Working Practice - Responsibilities of Sub-contractors

- It is the responsibility of the sub-contractors to be aware of and to comply with the obligations under the Health and Safety at Work Act 1974 (as amended), the Management of Health and Safety at Work Regulations 1999 (as amended), the Construction (Health, Safety and Welfare) Regulations 1996-building work (as amended), the Construction (Design and Management) Regulations 1994 (as amended) and other supporting legislation concerning Health and Safety relevant to their business operations.
- All sub-contractors will be provided with a copy of and expected to comply with the College's Health & Safety Policy.
- The sub-contractor must ensure their company policy is made available on-site whilst work is carried out.
- To safeguard the College's students, It would be helpful to know if a sub- contractor has been DBS checked and if so, to provide the College with a copy of the disclosure form. Sub-contractors who work regularly on the premises, will be required to provide an enhanced DBS check and should discuss this with the HSM.
- Sub-contractors without a DBS certificate will need to be appropriately supervised by a member of staff during college hours when students are present.
- All sub-contractors should abide by the visitor's policy and wear a visitors' badge whilst on college premises. The visitor's badge should be returned to Reception on leaving the premises.
- All sub-contractors are expected to abide by the following code of conduct:
 - do not enter in conversation or exchange contact information with students
 - stay within the agreed work area and access routes
 - obtain permission if you need to go outside the agreed work area or access routes
 - keep staff informed of where you are and what you are doing
 - do not use inappropriate language
 - do not use personal mobile phones to take photographs etc
 - dress appropriately - shirts to be worn at all times
 - observe the code at all times
 - Abide by College rules/procedures eg. fire procedures/smoking on site etc
 - Remember your actions no matter how well intentioned could be misinterpreted.

Any order for works or building contract should be let with a clear condition that failure to observe the code will entitle the College to exclude a member of contractors' staff from the premises. All sub- contractors are to provide evidence (including proof of payment – to demonstrate validity) of a sum to be agreed that is reflective of the nature of the project for both

employers and public liability insurance for the duration of any contract. This evidence is also required for any other sub-contractor used to fulfil the contracted work.

- All work must be carried out in accordance with the relevant statutory provisions and take into account the safety of others on the site, and the general public.
- All appropriate certificates should be provided for work carried out such as electrical work certificates.
- Scaffolding used by the sub-contractors' employees (even where scaffold has been erected for other contractors) must be inspected by their employer or a competent person appointed by their employer to ensure that it is erected and maintained in accordance with the appropriate regulations and codes of practice.
- Sub-contractors' employees are not permitted to alter any scaffold provided for their use or use or interfere with any plant or equipment on the site, unless authorised.
- All plant or equipment brought on to site by the sub-contractor must be safe and in good working condition, fitted with any necessary guards and safety devices, and with any necessary certificates available for checking.
- All transformers, generators, extension leads, plugs and sockets must be to latest British Standards for industrial use, and in good condition. All portable electrical appliances should be tested, identified, and recorded in a register, which must be available for inspection.
- Any injury sustained or damage caused by sub-contractors' employees must be reported immediately to the College's site representative.
- Sub-contractors' employees must comply with any safety instructions given by the company representative.
- Sub-contractors informed of any hazards or defects noted during inspections will be expected to take immediate action
- Sub-contractors will provide the College with the name of the person they have appointed as their Safety Manager.
- Suitable welfare facilities and first aid equipment in accordance with the Health & Safety Regulations must be provided by sub-contractors for their employees, unless arrangements have been made for the sub-contractors' employees to have the use of the College's facilities, in which case a certificate will be issued, detailing facilities provided.
- Any material or substance brought on site, which has health, fire or explosion risks must be used and stored in accordance with health & safety regulations and current recommendations, and that information (e.g. COSHH assessments) must be provided to any other person who may be affected on-site.
- A hot works permit will be provided for all hot works carried out on the College premises.
- Sub-contractors are particularly asked to note that workplaces must be kept tidy and all debris, waste materials etc. cleared as work proceeds.
- The sub-contractor shall not permit the consumption or presence of any intoxicating alcoholic liquor or drugs on any of the College sites at any time.

The sub-contractor shall not permit anyone employed by the contractor or sub- contractor to be present on the site if such person is judged to be under the influence of any intoxicating liquor or drugs.

Health and Safety – Boarding Appendix 1

Boarding Health and Safety:

This appendix covers:

- All students residing in the boarding houses.
- Staff responsible for managing and supervising the boarding houses.
- Visitors and contractors accessing the boarding facilities.

Roles and Responsibilities

Director of Boarding

- Along with the Assistant Head of Boarding to ensure compliance with health and safety regulations in all boarding houses.
- Oversee the implementation of Health and Safety Policy and procedures and conduct regular reviews.
- Work with the facilities manager to ensure appropriate checks, audits and documentation is in place for all boarding sites.
- Ensure that maintenance issues are addressed in a timely manner.

Houseparents

- Provide daily supervision and support to students.
- Conduct regular health and safety checks in their respective houses. This includes daily room and facility checks.
- Act as the first point of contact for students regarding any health or safety concerns.
- Follow fire evacuation procedures and report any Health and Safety issues immediately to the Facilities manager and Assistant Head of Boarding.

Students

- Follow house rules and report any health or safety concerns to staff.
- Participate in safety drills and comply with guidance on health and safety practices.

Facilities and Maintenance Team

- Ensure all boarding house facilities meet health and safety standards.
- Address maintenance issues promptly and conduct regular inspections.
- Liaise with the landlords and site managers for each boarding house on all matters with regards to the health and safety of the boarding sites.

Key Health and Safety Provisions

1. Safeguarding and Child Protection – See Safeguarding and Child Protection Policy.

- **Safeguarding Policies:** Ensure all boarding staff are trained in safeguarding and child protection, with clear reporting procedures for concerns.
- **Supervision:** Maintain appropriate staff-to-student ratios in each boarding house.
- **Designated Safeguarding Leads (DSLs):** Provide accessible safeguarding support to all students.

2. Fire Safety

- **Fire Drills:** Conduct regular fire drills in each boarding house. At least 3 successful drills, per site, per year. Failed drills are repeated until passed.
- **Alarms and Equipment:** Ensure all fire alarms, extinguishers, and exits are regularly tested and maintained.
- **Evacuation Plans:** Display clear evacuation procedures in all houses.
- **Residents and Staff:** Ensure all residents (staff and students) are aware of fire evacuation procedures and expectations. Those who do not follow these are followed up on.

3. Security

- **Access Control:** Use secure entry systems (Kabba keycard system or fobs) to restrict access to boarding houses.

- **Visitor Policy:** Require all visitors to sign in and be accompanied by staff. Clear signage is displayed at the entrance of each boarding house foyer detailing this policy and all residents are aware of the expectations.
- **Surveillance:** CCTV in communal and entry areas, respecting privacy laws. Accessible by relevant staff in the event of investigation required.

4. Health and Medical Support

- **Medical Care:** Access provided to a school nurse and ensured students are registered with a local GP.
- **Medication Management:** Safely store and administer student medications as needed as per the policy.
- **Mental Health Support:** Wellbeing and Safeguarding team work with the boarding staff to support the mental health of our students. Relevant referral networks are in place to support students as and when required.

5. Accommodation Standards

- **Room Safety:** Ensure rooms meet health and safety standards, including fire safety and electrical safety checks. Daily room checks monitor this and items are confiscated where applicable.
- **Hygiene:** Maintain cleanliness in shared bathrooms, kitchens, and communal areas. Each room is cleaned weekly by our contractors and daily room checks monitor hygiene.
- **Privacy:** Students are in single occupancy, en-suite rooms. Staff have a door knocking procedure to allow for privacy. Doors are locked and accessed by Keycard, fob or key system.
- **Maintenance:** Students aware to report maintenance issues to staff. Staff use daily room checks to monitor maintenance issues. Work with the landlord, site managers and maintenance teams to address issues.

6. Cultural and Language Support

- **Orientation:** Induction program is offered for new students, covering UK safety laws, school policies, and local resources.
- **Cultural Sensitivity:** Staff are trained in cultural awareness to address the diverse needs of the international student body.

7. Online Safety

- **Internet Filtering:** All boarding houses have suitable filtering and monitoring systems to block harmful or inappropriate websites.
- **Education:** Lifeskills programme covers topics on online safety, cyberbullying, and digital responsibility.
- **Supervision:** Monitor internet use in communal areas and provide guidelines for responsible device use.

8. Transportation Safety

- **Travel Policies:** There are clear guidelines for independent travel within Oxford, including curfews and emergency contact procedures.
- **School Transport:** When school-provided transport is used (chauffeur service to airports) we ensure they meet safety standards and drivers are vetted.
- **Emergency Preparedness:** Students have emergency contact numbers in the event of requiring support.
- **Personal Safety:** Students inducted in personal safety on arrival. Students are advised to move around the city in groups of two or more.

9. Risk Assessments

- **Boarding House:** Each boarding house has a bespoke risk assessment on our SPHERA software. These are frequently reviewed and staff are aware of these.
- **LARA:** A Local area Risk Assessment is in place which reviews, assesses and mitigates risk in the local area where possible.
- **Contextual Safeguarding:** Other contextual Risk Assessments are present and reviewed with regards to Mixed gender sites, mixed aged sites, use of electronics and city of Oxford too.

10. Anti-Risk Behaviour Policies

- **Behaviour Policy:** There is a 'Promoting positive behaviour' policy in place which reviews all behavioural issues including risky behaviours and appropriate actions are taken.
- **Substance Abuse:** There is a strict no-tolerance policy for alcohol, drugs, and smoking.
- **Peer Interactions:** Monitor communal areas to prevent bullying, harassment, or inappropriate behavior.
- **Health Education:** Provide sessions on managing stress, healthy living, and making safe choices.

Monitoring and Review

- **Regular Inspections:** Conduct health and safety audits of all boarding houses on a termly basis. Resident staff complete these daily.
- **Feedback Mechanisms:** Encourage students and staff to report concerns or suggest improvements to develop a culture of transparency and proactivity.
- **Policy Review:** Update this policy annually to reflect changes in regulations, students and sites where applicable.