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**CLIENT: Moira House Girls School**

**PROPERTY: Moira House Girls School, Upper Carlisle Road, Eastbourne, East Sussex, BN20 7TE**

**AUDIT DATE: 4 May 2017**

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## **1 Instructions**

Phase Consultants Limited has been instructed to undertake an audit and review of the arrangements for the management of health and safety in respect of the business activities of the Moira House Girls School (referred to in this report as the “school”) based at the premises at Upper Carlisle Road, Eastbourne.

As part of the review, we have not been instructed to update the risk assessment records in relation to equipment used and work activities undertaken by school personnel.

This report summarises the findings of the inspection and makes recommendations for action.

## **2 Extent of Audit**

The audit and review comprised an examination of management systems and records; interviews with key personnel; an overview of the extent of the activities of the school and the nature of activities undertaken; and a visit to the principal grounds, and buildings.

The inspection was undertaken by our adviser, Burt Browne, who met and interviewed the line manager for Operations, David Pollard, and his colleagues, Paul Graham (head of maintenance), Jane Stutter (domestic bursar), Danielle Mackenzie (head of PE) and Steve Crum (assistant head), who deal with the implementation of school matters. The inspection extended to the buildings and grounds used by the school at the Upper Carlisle site, the work-rooms, and the associated facilities, including Physical Education facilities adjoining.

This was the first audit undertaken by us of practices at the school. The extent of the audit and the arrangements for the management of health and safety generally were discussed with David Pollard. The audit extends to the work activities carried out by school personnel and which include management of the school site generally. The audit does not extend to teaching and pastoral activities relating to pupils, both of which are addressed by Independent School Inspections and associated procedures.

## **3 Summary of Audit Findings**

School property comprises a range of buildings grouped into the Junior School, and the Senior School across three main “houses” (Boston House, School House, and Dunn House), a caretaker’s flat, and PE facilities (pool, hall, fitness courts, pitches). General maintenance and repair activities on school premises are carried out by Maintenance staff under Paul Graham’s supervision with assistance from contractors for more extensive work.

Working practices within the school appear to be maintained both in terms of practical arrangements for the management of safety, and health and in terms of management systems and record keeping.

The school's overall health and safety policy and arrangements document is extensive and covers all of the school's activities, although the policy was examined as part of the current audit, working practices within the school (specifically those of the assistant head, management of Operations, domestic bursar, and the PE Department) were also examined. The school's central management staff regularly update the policy, which is signed by the Principal and was last updated March 2017. Implementation of the policy and department-specific matters such as the preparation of risk assessments is the responsibility of department managers.

At the time of our audit, the Construction (Design and Management) Regulations 2015 (the CDM Regulations) had come into force 25 months previously on 6 April 2015 however we did not discuss with David Pollard in detail the procedures for compliance with the regulations; i.e. assistance with CDM compliance matters and checking of all pre-construction information and construction phase plan documents. We were informed the CDM Regulations were dealt with separate to the Operations Manager role. However, if this is not the case further consideration should be given to the need to confirm this at a later date.

A system of risk assessments with assessment records for each item of equipment, which are supplemented by assessments for routine work activities which are carried out regularly across the site, is recommended. Risk assessments for equipment and routine tasks can be supplemented by job-specific assessments for "one-off" tasks, the format of which ties in with the provisions of the Construction (Design and Management) Regulations 2015.

Recommendations arising from the audit were discussed with David Pollard during our visit. The recommendations are summarised on the attached schedule for action.

We have assessed the health and safety management arrangements, accompanying records and working practices against key indicators and our findings confirm that the current arrangements are adequate, with all significant matters understood by David Pollard (operations) and Steve Crum (students' activities/trips). The audit did not extend to interviews with all school personnel and so we cannot verify whether the system is understood fully by all staff but matters identified during the audit which gave cause for action in this respect are in the attached schedule. A summary of our assessment is attached to this audit report.

## **4 Recommendations**

A number of matters were identified where it is recommended that initial measures should be put in place to begin to further improve compliance with health and safety law, associated duties, and best practice. Refer to the attached schedule for action for details, the high priority items are:

- Confirm staff resourcing of health and safety.
- Introduce a weekly half-hour health and safety meeting to enact the policy.
- Review fire risk assessments and competency of assessor.
- Policy supported by procedure to facilitate visual inspection of students' electrical goods upon arrival.
- Introduce a ladder register.
- Update the health and safety management system.
- Review health and safety training arrangements.

## 5 Date for Next Review

It is recommended that the arrangements for the management of safety, health and the environment are next reviewed in twelve months' time, with the next inspection on or around 4 May 2018 (being twelve months from the date of the last inspection) or if there are significant changes within the business, whichever is the earlier.

## 6 General Matters

This report has been prepared for the use of the client for the stated purposes and no responsibility can be accepted for use by any other person or organisation or for the use of the report in any other context. In this respect, the contents of this audit report and all related documents prepared in conjunction with this report are confidential to the client and are not intended to be relied upon or used by any third parties under the provisions of the Contracts (Rights of Third Parties) Act 1999.

Neither the whole nor any part of this report, nor any reference to it, will be allowed to be included in any published document, circular or statement or otherwise published in any way without prior written approval from Phase Consultants Limited of the form and context in which it may appear.

Failure to comply with health and safety legislation may constitute a criminal offence for which the Police, the Health and Safety Executive (HSE), or the Local Authority can prosecute depending on the nature of the business and the nature of the offence committed.

It is not possible to contract out of liability for health and safety duties imposed by the law. Ultimately, the employer of personnel within the business or the owner or occupier of property may be liable but, in practice, the authorities will consider the chain of command and decide where responsibility lies. The employer, owner or occupier must therefore take reasonable steps to provide a system of work which is reasonably safe and to ensure that the system is implemented. Advice provided by Phase Consultants Limited is intended to assist the employer, owner, or occupier in complying with his legal obligations and no liability can be accepted by Phase Consultants Limited for failure to implement measures required by law.

## 7 Enclosures

The following documents referred to in this report are enclosed:

- Summary of assessment of key indicators.
- HSE information documents.
- Ladder register.

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Report prepared for Phase Consultants Limited by:



# MOIRA HOUSE GIRLS SCHOOL: SAFETY AND HEALTH ACTION

Date of audit: 4 May 2017

Ref.	Details of Action Required	Priority	Approximate Costs	By Whom	When
<b>High Priority Action Required</b>					
1	Confirm staff resourcing of health and safety. Staff have high awareness of health and safety needs; however, there is wide expression of insufficient resources to update, use and improve knowledge of health and safety. It appears that there are concerns about lack of time and other resources to address issues (meeting, fire safety, management, reviewing) and this needs to be investigated. Staff roles and availability of time to manage health and safety matters should be reviewed. The requirement to introduce new roles should be considered. The roles need to be clarified and should be detailed to specify which individuals oversee which specific aspects of health and safety. Ensure that an individual is appointed to supervise management of the health and safety system. Resourcing should be communicated to staff as required until such time that the current situation of acting posts is settled.	High	To be confirmed	Principal to arrange	Within 1 month
2	Introduce a weekly half-hour health and safety meeting to enact the policy. There is wide staff support for such a meeting, chaired by the Principal, and attended by the Vice Principal, Operations Manager, Domestic Bursar, and Head of PE. In addition, the weekly frequency of the meeting would enable timetabling to be arranged around operations activities at the school.	High	"In house" work	Operations Manager to arrange	Within 1 month
3	Review fire risk assessments and competency of assessor. A specific area for review is the fire alarm, namely the risk assessment behind the decision to link building alarms across the property (potentially affecting student examinations for example) and annual testing regime of the alarm. Include review of evacuation procedures, and access control (determining who is in/who is out of the buildings). Student's electrical goods are dealt with separately below.	High	"In house" work	Operations Manager to arrange	Within 1 month

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Ref.	Details of Action Required	Priority	Approximate Costs	By Whom	When
4	There is a high probability of students bringing unsafe electrical goods into the boarding establishment, presenting a risk of fire. As a minimum, a policy supported by a procedure to facilitate visual inspection of students' electrical goods upon arrival is recommended. Improved precision regarding control of Portable Appliance Testing of student's electrical goods is required.	High	"In house" work	Operations Manager to arrange	Within 1 month
5	Introduce a ladder register. A simple register will identify each ladder at the school as checked by the Maintenance Supervisor. An improved register will record the work the ladder was used for, who has used the ladder, if the ladder was secured or not, and if the ladder was used for access (i.e. not for the work itself). The Virtual Learning Environment (VLE) may have facility for a ladder register.	High	"In house" work	Operations Manager to arrange	Within 1 month
6	Update the health and safety management system, and appoint a "champion" to monitor/manage the system. The policy was reviewed by the school February 2017; however, the system was prepared by Mentor and last updated 29 March 2015. As such there is scope for the system to be updated and detailed to better match and support the policy. Emergency procedures, relevant utility companies and services should be detailed in the system.	High	To be confirmed	Principal to arrange	Within 1 month
7	Review health and safety training arrangements. There is a range of staff training, with some staff reporting no recent training, and others being vague in terms of recollecting training. Staff evaluation of training is recommended to form part of the process, to ensure training is effective. Specific training actions are detailed in action 8 to 12 below.	High	To be confirmed	Principal to arrange	Within 1 month
<b>Medium Priority Action Required</b>					
8	Review training on the Education (Independent Schools Standards) Regulations 2014 and Boarding schools' national minimum standards (2015), and provide/refresh this as required.	Medium	To be confirmed	Principal to arrange	Within 3 months

# MOIRA HOUSE GIRLS SCHOOL: SAFETY AND HEALTH ACTION

Date of audit: 4 May 2017

Ref.	Details of Action Required	Priority	Approximate Costs	By Whom	When
9	Risk assessment training is recommended for review, to ensure quality and uniformity of staff input of risks into the VLE. Training is recommended around the subject of management of work equipment. The domestic bursar indicated they would benefit from risk assessment training.	Medium	To be confirmed	Principal to arrange	Within 3 months
10	Check qualifications of the Operations Manager against role, particularly in terms of the Construction (Design and Management) Regulations 2015. Arrange any refreshers or additional training as required, for both acting and permanent appointments.	Medium	To be confirmed	Principal to arrange	Within 3 months
11	Review training on, and in terms of, the Control of Asbestos Regulations 2012, Provide/refresh asbestos training as required. Staff need to be aware when asbestos is present and when to escalate/seek advice if they have concerns.	Medium	To be confirmed	Operations Manager to arrange	Within 3 months
12	Check qualifications of the Maintenance Supervisor against role, specifically in terms of electrical work. Arrange any refreshers or additional training as required.	Medium	To be confirmed	Operations Manager to arrange	Within 3 months
13	Review management of maintenance via the VLE. Although all staff reported the VLE as effective for recording maintenance issues, it was not visually inspected. The Maintenance Supervisor expressed concern that at times the number of issues recorded on the VLE become unmanageable. Staff also reported concern about competing for maintenance resource, via the VLE. Practical review and reprioritisation of the VLE report is recommended as part of the weekly health and safety meeting.	Medium	"In house" work	Operations Manager to arrange	Within 3 months

# MOIRA HOUSE GIRLS SCHOOL: SAFETY AND HEALTH ACTION

Date of audit: 4 May 2017

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14	The policy is that the premises are inspected on a regular basis. There is wide staff support for this to be dealt with in detail, commencing with the Operations Manager allocating 8 hours with the Maintenance Supervisor to bring a full inspected of the premises up-to-date, and prioritise problems which have accumulated over the years due to lack of being addressed. Lighting is recommended to be reviewed specifically, with time for maintenance, prior to British Winter time (daylight saving). Necessary changes and improvements are recommended to be allocated to either a maintenance or major works budget. PE facilities are recommended to have their own major works budget arranged by the head of department.	Medium	"In house" work	Operations Manager to arrange	Within 3 months
15	Update the Head of PE on resurfacing of the netball courts which show significant surface deterioration. The Head of PE is concerned there is a high risk of injury which they are managing by reducing use of the netball courts and cancelling events.	Medium	To be confirmed	Operations Manager to arrange	Within 3 months
16	Implement a register to manage health and safety of teaching equipment etc. By registering equipment held by each department, and managing equipment into and out of each department, comprehensive risk assessment would be supported.	Medium	To be confirmed	Vice Principal to arrange	Within 6 months
17	Agree a uniform template for risk assessment. At present risk assessments are completed on several different templates. A uniform template should be agreed. In addition, the HSE provide a template classroom checklist (copy enclosed with this report) which should be considered for use at the school.	Medium	To be confirmed	Vice Principal to arrange	Within 6 months
18	Record of checking classrooms by teachers. At present teachers do not consistently record a check when they take responsibility for a new classroom, when a classroom layout is changed, or annually if there are no changes. It is recommended that formal checks are made and that a checklist record is kept for reference.	Medium	To be confirmed	Vice Principal to arrange	Within 6 months
19	Maintenance Department equipment risk assessments. The recent Portable Appliance Testing (PAT) provides the list of the electrical equipment, for which risk assessments should be arranged.	Medium	"In house" work	Maint. Supervisor to arrange	Within 6 months

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20	Handover of premises to tenant (Accord). Operational matters need addressing. The format of the handover needs agreeing (for example should it include fire alarm testing). It therefore needs an operations person being responsible. Recent practice has been for the domestic bursar to handover the premises to the summer tenant.	Medium	"In house" work	Operations Manager	Within 6 months
21	Review health and safety records. Once issues of staffing and time for health and safety have been resolved, time should be directed to reviewing health and safety records.	Medium	"In house" work	Department heads to arrange	Within 6 months
22	Review arrangement with Equestrian Centre. It is evident that staff feel they were not adequately consulted on the introduction of the Equestrian Centre, and that the horses have significantly impacted on the use of the premises by the school. The school is to complete an assessment of the health and safety risks from the Equestrian Centre, risk to the school and its students. Request the Equestrian Centre as an organisation manages the provision of a separate risk assessment of its activities. Items for consideration include deliveries, horse movement (details follow), security, supervision, fencing (temporary and permanent), and signage. At present horses cross the sports pitch, presenting a risk to students' safety. This arrangement should be revisited for improvement. It should be explored if it would be viable for horses to access their exercise yard via the new tennis area. A meeting with the staff is recommended to learn lessons for future comparable major works programmes, and to agree next best steps to be discussed with the Equestrian Centre at a separate meeting.	Medium	"In house" work	Principal to arrange	Within 6 months

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23	Review working environment. Several staff expressed desire to improve their working environment. Key issues were ability to work on confidential information, and suitability of space provided for meetings and the nature of their work. The PE department would benefit from a landline to their office to improve access to emergency services. Dedicated mobile phones for the PE department would also improve safeguarding of student data by reducing the risk of personal mobiles being used to contact parents etc. The use of 2-way radios generally on-site should be discussed to decide if this would bring health and safety improvements. Staff changing facilities would enable use of the PE department, with consequent health benefits and exemplary behaviour to students.	Medium	To be confirmed	Principal to arrange	Within 6 months
<b>Low Priority Action Required</b>					
24	Review approved/centralised contractors list. Approval of contractors is the responsibility of the Human Resources (HR) Manager. The HR Manager was not present and hence approval of contractors was not audited. The demonstration and recording of competency for contractors. Appropriate resourcing and competency to approve contractors (i.e. determining if the HR manager should be supported by other staff or trained) is recommended to be included in this review.	Low	"In house" work	Principal to arrange	Within 9 months

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Ref.	Details of Action Required	Priority	Approximate Costs	By Whom	When
25	Vehicle and pedestrian segregation. It is recommended to review parking arrangements to reduce vehicles reversing on site. The assembly point is presently a main vehicle thoroughfare and parking area, and management of this must be included in the emergency procedures. The number of vehicles (school buses) itself is recommended for review, to ensure it is fit-for-purpose. At present deliveries are made to a main student walkway, and this is recommended to be stopped for all but necessary (heavy) deliveries. Generally, deliveries should be made in the main parking and carried by hand to reception. Consideration should be given to speed limit signs and traffic calming strips. Renewed use of access and parking at the main entrance and Dunn House should be taken into consideration. It was suggested by a staff member that the preparatory school entrance be redesigned exclusively for pedestrians. If this was the case, potentially this entrance could be grassed to compensate for the top lawn lost to the Equestrian Centre.	Low	To be confirmed	Operations Manager to arrange	Within 9 months
26	Improve the manual management of facilities data, or extending digital facilities management. The consideration is that the current manual filing system for facilities is difficult to manage in terms of access to information. No obvious missing records were noted, but the system is cumbersome. The recommendation is for an annual plan for the school, summarising on one page/screen the school's facilities management status. This summary would be supported in turn by each of the various building's facilities management status.	Low	To be confirmed	Vice Principal to arrange	Within 9 months
27	Obtain the risk assessment of the roads between the school sites from East Sussex County Council. This will enable consideration of the roads with a view to improve student safety when crossing the roads between school sites.	Low	To be confirmed	Operations Manager to arrange	Within 9 months
28	Consider inviting ambulance service to familiarise themselves with the school, particularly access to PE facilities.	Low	To be confirmed	Principal to arrange	Within 12 months
29	PAT register. Review the Maintenance Supervisor's competency to bring the PAT register "in house"; specific PAT training is recommended, and this could result in some cost savings if staff have time to do the work "in house".	Low	"In house" work	Operations Manager to arrange	Within 12 months

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Ref.	Details of Action Required	Priority	Approximate Costs	By Whom	When
30	Review asbestos management. Asbestos management was not audited in detail. The management plan is understood to be generally adequate. Refer to asbestos training action 11 above. Contractors must be briefed and this must be recorded. Asbestos must be in with the CDM procedures referred to in 10 above.	Low	"In house" work	Operations Manager to arrange	Within 12 months

**CLIENT: MOIRA HOUSE GIRLS SCHOOL**  
**PROPERTY: MOIRA HOUSE GIRLS SCHOOL**



**Index system:**

**H&S AUDIT**

**INSPECTION CARRIED OUT BY:**

Burt Browne

**DATE:** 04.05.17

Unaware	0
Aware of need	1
Aware and exists	2
Aware/exists/up to date (< 1 yr)	3
Aware/exists/up to date/used	4
As above/person dealing knows detail	5

**Assessment** n/a Index Comment

Assessment	n/a	Index	Comment
<b>Written policy statement:</b>			
Format		3	Use not detailed
Organisational chart or details		3	Details not used
Contact information		5	Detailed
Signed		5	
<b>Arrangements:</b>			Out of date
Emergency procedures, utility companies & services		1	Needed
Accident investigating and reporting		3	Operations Manager to update
First aid		5	Included in policy
Occupational health		2	Referred to only
Noise		2	As RA example
Vibration		2	Referred to in RAs
Stress, violence and bullying		2	Content out of date
Workplaces and welfare facilities		5	In policy and statement
Premises and occupier's liability		1	Not in statement
Hazard i/d, risk assessment & control		2	Principal to arrange update
COSHH and substances hazardous to environment		2	Content out of date
Diseases		2	Mainly within RIDDOR
Legionellosis		5	Operations Manager to confirm
Lone working		2	Content out of date
Manual handling		2	Responsibilities out of date
PPE		2	Content out of date
Asbestos management		2	To be revised
Lead		0	Not covered
Working at height		2	Content out of date
Confined spaces		2	Within contractors content
CDM		5	Under contractor statement
Vehicles		2	Within various content items
Plant & equipment		2	Operations Manager to update
Mobile phones		1	Only re. Lone working
DSE		3	Content out of date
Electrical safety		2	Within content statement
Gas safety		2	Within various content items
Fire safety		2	Content out of date
Water supplies		5	With Legionellosis and BM
Catering	5		N/A
Trees		1	Not specifically
Visitors		5	Included in policy
Managing contractors		2	Content out of date
Waste Management	5		
Energy use (EPCs - bldngs, air con)	5		
Provision of information & consultation		5	Included in policy
Training & supervision		5	Covered in policy
Appointment of "competent person"		2	Content out of date
Monitoring		5	In policy
Review & audit		2	Content out of date

<b>Records:</b>			
H&S law poster		5	
Employers' liability insurance cert		5	
Emp. liab. ins. cert. retained		5	
Accident book		5	
Risk assessments		2	Available, not all up to date
COSHH assessments		2	Seen, not all up to date
Asbestos management plan		3	To be confirmed up to date
Vehicle maintenance checklists		5	
Plant & equipment maintenance checklists		5	
Electrical installation certificates		2	TBC available and up to date
Electrical PAT records		5	
Gas test certificates		5	
Fire risk assessments		2	To be confirmed up to date
Tree safety survey		2	Unknown, no policy in place
Approved contractors list		2	To be confirmed up to date
Contractors' hazard assessments		2	No examples seen, TBC
Waste management exemptions	5		
Hazardous waste producer registration	5		
Waste carrier licence or waste transfer notes	5		
EPCs (bldngs, air con)	5		
Training records		5	
Monitoring records		1	Needed
Review & audit records		1	Needed
<b>Practices:</b>			
Emergency drill		5	
First aid kit		5	
Working environment & welfare facilities		2	
Risk assessment understanding & use		4	To be practised
Lone working procedures		5	
Manual handling practices		5	
PPE provision, use & maintenance		5	
Asbestos awareness		5	
Work at height awareness		5	
Ladder register		0	Needed
Scaffold competence		5	
Vehicle, plant & equipment condition		5	
Lifting equipment tests		5	
Pressure equipment tests		5	
Electrical installation tests		5	
PAT tests		5	
Fire extinguisher supply & service		5	
Contractor liaison & supervision		5	

**Discounted Factors**

35

**Index total**

86 258

**Audit score %**

65.3