

Health and Safety Policy

This policy applies to:

Francis Holland Regent's Park Francis Holland Sloane Square Francis Holland Prep

Where there are differences between the schools these have been clearly highlighted.

Policy owner	Trust: Chief Operating Officer; Director of Estates and Facilities.
Type of policy	Regulatory [Regulation number: Part 3 11] Relevant laws are complied with by the drawing up and effective implementation of a written health and safety policy
Last reviewed / approved by / date	SLTs: Spring 2025 Governance and Nominations: 3rd June 2025
Next school review due	Spring 2026
Next council review due	Governance and Nominations: June 2026
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Circulation	<input type="checkbox"/> Trust Website <input checked="" type="checkbox"/> Schools' Websites <input checked="" type="checkbox"/> Schools' Sharepoints <input type="checkbox"/> FHS People All policies are available from the Trust Office, Francis Holland Schools Trust, 35 Bourne Street, London, SW1W 8JA
Linked Policies	Risk Assessment Policy Fire Safety Policy Safety During Educational Visits Policy First Aid and Accident Reporting Policy Emergency and Critical Incident Plan

Health and Safety Policy

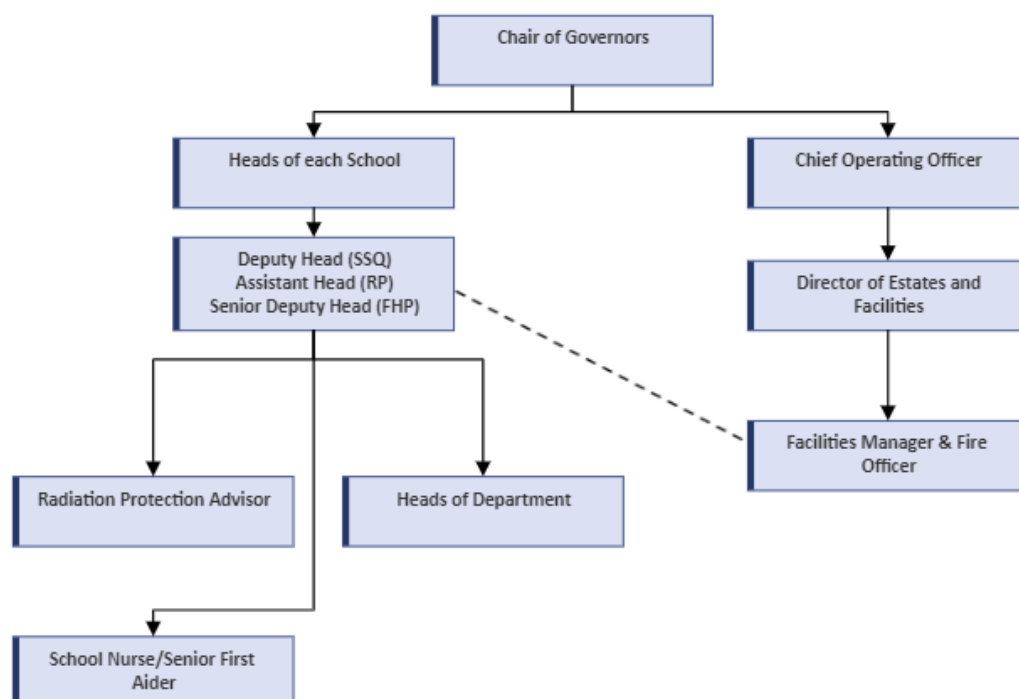
Part A: General Policy Statement

Francis Holland Schools note the provision of the Health and Safety at Work etc. Act 1974 and acknowledges and accepts that they have a responsibility to take all reasonably practicable steps to secure the health and safety of pupils, staff and others using the premises or participating in school-sponsored activities. Health and Safety is a main agenda item at all meetings of the governing body.

Francis Holland Schools aim to provide a safe and healthy working and learning environment for staff, pupils and visitors at the Schools.

Francis Holland Schools will take all reasonable steps to identify and reduce hazards to a minimum, but all staff and pupils must appreciate that their own safety and that of others also depends on their individual conduct and vigilance while on the school premises or while taking part in school-sponsored activities.

Part B: Health and Safety Organisational Structure:



Post	Postholder for Regent's Park	Postholder for Sloane Square	Postholder for FHP
Chair of Governors	Mr Patrick Sherrington	Mr Patrick Sherrington	Mr Patrick Sherrington
Head	Mrs Katharine Woodcock	Mrs Alexandra Haydon	Mrs Suzy Dixon
COO (and Chair of Health and Safety Committee)	Mr Geoff Wilmot	Mr Geoff Wilmot	Mr Geoff Wilmot
Director of Estates & Facilities	Mr Zah Rasul	Mr Zah Rasul	Mr Zah Rasul
Deputy / Assistant Head / Director of Operations / Operations Manager	Mrs Amelia Slocombe/Ms Sarah Hack	Ms Julie Wood	Mr Bruce Wilson
Head of Art	Ms Niamh Carew	Mr David Edes / Ms Collette Coleman	Ms Ninette van Kamp
Head of ICT / Computer Science	Mr Monir El Moudden	Mr Thomas Hayward	Mr Andrew Hart
Head of PE	Mr Aaron Gough	Ms Georgina Newsome	Ms Annaleece Feeney
Head of Science	Mr Jason Bosse	Ms Rebecca Norman	Mr Andrew Hart
Head of Drama	Ms Helen Simmons	Ms Emily Smyth	Ms Tammy Jacobs
Facilities Manager (and Fire Officer)	Mrs Antoinette van der Werf	Mr Csaba Simon	Mr Csaba Simon
Senior First Aider / Nurse	Ms Nina Loch	Ms Kelly Wilson	Ms Sarah Wheeler/ Ms Lucy Kelly
Director of Technology	Mr Matt Britland	Mr Matt Britland	Mr Matt Britland
Radiation Protection Advisor	Imperial College Consultants (internal contact: Dr Carrie MacTavish)	Guys and St Thomas' Medical Physics Dept (internal contact: Dr Nigel Upcott)	Not applicable

Part C: Arrangements and Duties

1 Duties of the Governors

Francis Holland Schools Trust, acting through the Governing Body, has responsibilities, in consultation with the Heads and COO, as summarised below:

- To make itself familiar with the principal requirements of health and safety legislation and codes of practices which are relevant to the work of the school, in particular the Health and Safety at Work etc Act 1974 and the Management of Health and Safety at Work Regulations 1999;
- To encourage a full and effective communication on health and safety matters between the Governors and the Heads and COO;
- To keep details of this policy under review as and when appropriate;
- To assess its effectiveness periodically and to ensure as far as is reasonably practicable that any necessary changes are made;
- To seek to ensure as far as is reasonably practicable that its contents are fully publicised;
- To give the Heads and COO the responsibility of implementing this Health and Safety Policy and in doing so ensure as far as is reasonably practicable that the regular meetings of persons comprising a Health and Safety Committee take place at least three times a year. The COO should chair the meetings which should be attended by persons appointed by the COO and Heads. The brief of the Committee is to consider all aspects of health and safety in the school;
- To seek to identify and consider the principal risks relating to accidents and health.
- To oversee the implementation of this policy through appropriate measures, including H&S walkabouts and visits to the School.

In particular, the Governors will seek to ensure so far as is reasonably practicable that the School provides:

- A safe place for staff and pupils to work including safe means of entry and exit;
- Plant, equipment and systems of work that are safe;
- Safe arrangements for the handling, storage and transport of articles and substances;
- Safety awareness amongst all employees and pupils;
- A safe environment for all visitors to the school;
- All employees and pupils with the information, instruction, training and supervision that they require to work safely and efficiently.

2 Duties of the Head

The Head of each School has oversight of health & safety for all academic, pastoral and co-curricular activities of their School and will work closely with the COO in the overall delivery of health & safety requirements.

The Head is required (with the COO as appropriate):

- To take all necessary and appropriate action to seek to ensure that the requirements of relevant legislation, codes of practice and guidelines are met at all times;
- To seek to ensure, at all times, the health and safety and welfare of staff, pupils and others using the school premises;
- To seek to ensure the safe working practices and procedures throughout the school including those relating to the provision and use of machinery and other apparatus, so that each task is carried out to the required standards and so that all risks are controlled so far as is reasonably practicable;
- To consult with members of staff on health and safety issues;
- To monitor systems of risk assessment to allow prompt identification of potential hazards;
- To monitor periodic reviews and safety audits and the findings of risk assessment;
- To identify the training needs of staff and pupils to seek to ensure, within the financial resources available, that all members of staff and pupils who have identified training needs receive adequate and appropriate training in health and safety matters;
- To make an up to date copy of the policy available on the School system;
- To seek external advice on matters of Health and Safety when appropriate;
- To encourage staff, pupils and others to promote health and safety;
- To seek to ensure that any defect in the premises, its plant, equipment or facilities which relate to or may affect the health and safety of staff, pupils or others are made safe without delay;
- To seek to ensure as far as is reasonably practicable that the procedure for the reporting of accidents taking place on the premises, or while pupils are off the premises but in the care of the school, is followed correctly;
- To collate accident and incident information and, when appropriate, carry out accident and incident investigations;
- To monitor the standard of health and safety throughout the school, including all school-based activities, encourage staff, pupils and others to achieve the highest possible standards and discipline those who consistently fail to consider their own well-being or the health and safety of others;
- To monitor first aid and welfare provision;
- To monitor the management structure for Health and Safety along with the Governors;
- To seek to ensure that instructions for dealing with fire or other emergencies are displayed and complied with.

3 Duties of the COO

The COO, with the support of the Facilities Director, has oversight of health & safety for all Francis Holland Schools facilities and for all activities, other than the academic, pastoral and co-curricular ones,

that are primarily overseen by the Heads. The COO will work closely with the Heads in the overall delivery of health & safety requirements. The COO is required (with the Head as appropriate):

- To take all necessary and appropriate action to seek to ensure that the requirements of all relevant legislation, codes of practice and guidelines are met at all times;
- To seek to ensure, at all times, the health and safety and welfare of staff, pupils and others using the school premises;
- To seek to ensure the safe working practices and procedures throughout the Schools including those relating to the provision and use of machinery and other apparatus, so that each task is carried out to the required standards and so that all risks are controlled so far as is reasonably practicable;
- To consult with members of staff on health and safety issues;
- To monitor systems of risk assessment to allow prompt identification of potential hazards;
- To arrange a full audit of school Health & Safety by the appointed consultants every three years and to monitor periodic reviews and safety audits and the findings of risk assessments;
- To identify the training needs of staff and pupils to seek to ensure, within the financial resources available, that all members of staff and pupils who have identified training needs receive adequate and appropriate training in health and safety matters;
- To seek to keep this policy under review at least annually and to make changes as and when appropriate. When changes have been made to the policy, a copy will be made available on the School system;
- To seek external advice on matters of Health and Safety when appropriate;
- To encourage staff, pupils and others to promote health and safety;
- To seek to ensure that any defect in the premises, its plant, equipment or facilities which relate to or may affect the health and safety of staff, pupils or others are made safe without delay;
- To seek to ensure as far as is reasonably practicable that the procedure for the reporting of accidents taking place on the premises, or while pupils are off the premises but in the care of the School, is followed correctly;
- To collate accident and incident information and, when appropriate, carry out accident and incident investigations;
- To monitor the standard of health and safety throughout the Schools, including all school-based activities, encourage staff, pupils and others to achieve the highest possible standards and discipline those who consistently fail to consider their own well-being or the health and safety of others;
- To monitor first aid and welfare provision;
- To monitor the management structure for Health and Safety along with the Governors;
- To seek to ensure that instructions for dealing with fire or other emergencies are displayed and complied with.

4 Duties of the Director of Operations (SSq), Assistant Head (RP) and Operations Manager (FHP)

The Senior/Assistant Heads, Director of Operations (SSq) and the Operations Manager (FHP) will assist the Heads with the implementation of health & safety responsibilities, including liaising and working closely with the COO. The Senior/Assistant Heads, Director of Operations, and Operations Manager is also specifically required:

- To maintain a list of First Aiders and advise the Heads when additional training is required
- To ensure that new teaching, academic and laboratory staff receive adequate guidance on the school's policy and procedures regarding Health & Safety, including First Aid.

5 Duties of the Health and Safety Committee

All members of the Health and Safety Committee will make themselves familiar with the principal requirements of the Health and Safety at Work etc, Act 1974 and other health and safety legislation and codes of practice which are relevant to the work of their area of responsibility.

In addition to the general duties which all members of staff have, they will be directly responsible to the Head and the COO and have overall day to day responsibility for their implementation and operation of the school's Health and Safety Policy within their relevant departments and areas of responsibility.

As part of their day-to-day responsibilities, they will ensure that:

- Safe methods of working exist and are implemented throughout their department;
- Health and safety regulations are being applied effectively;
- Staff, pupils and others under their jurisdiction are instructed in safe working practices;
- Regular safety inspections are made as required by the Heads and the COO;
- Positive corrective action is taken, when necessary;
- All plant, machinery and equipment in the department is adequately guarded
- All reasonable steps are taken to prevent unauthorised or improper use of equipment;
- Protective clothing and equipment, first aid and fire appliances are available;
- Toxic, hazardous and highly flammable substances are correctly used, stored and labelled;
- Monitor the standard of health and safety in the departments in which they work
- Encourage staff, pupils and others to achieve the highest possible standard of health and safety and discipline those who consistently fail to consider their own well-being or the health and safety of others
- An annual audit of the plant is made, with Health and Safety concerns being brought to the COO.

The Health and Safety Committee meets once a term to discuss agenda items which will cover all appropriate areas of work and concern.

Individual Heads of Departments who serve on the committee are responsible for producing a written statement relating to Health and Safety within their department and a copy should be given to the Deputy / Assistant Head/ Director of Operations/Operations Manager/Health and Safety Officer. This statement should be checked annually and updated as necessary.

Procedures are as follows:

- At RP Health and Safety and Fire are agenda items for all full staff meetings; at SSq and FHP Health and Safety and Fire are on the agenda for weekly SLT meetings and on full staff development day meetings.
- Risk assessments are carried out regularly, for all areas of the school, activities and trips;
- There is a termly Health and Safety walk around the School by the Head or nominee, Deputy/ Assistant Head/Director of Operations/Operations Manager, COO, Facilities Director, Facilities Manager and Health & Safety Officer to identify areas of concern that have not already been addressed;
- There are additional Health and Safety details for: Art, PE and Science and certain activities in Drama and Music. Health and Safety policies for Catering and Cleaning are the responsibility of the contractor.
- For Fire Safety please see the Fire Safety Policy and Procedures
- For First Aid and Reporting please see the First Aid and Reporting Policy

Responsibility for certain areas of risk that are overseen by the Health and Safety committee, are delegated to responsible persons as follows:

Areas of responsibility	
Health and safety, inc RIDDOR reporting (see First Aid and Accident Reporting Policy, and Risk Assessment Policy, for further details)	Head, Chief Operating Officer & Director of Estates & Facilities, Director of Operations (SSq) Assistant Head Operations (RP) Operations Manager (FHP)
Buildings and security	Facilities Manager
Fire	Facilities Manager
First Aid	Medical Team
Departments particularly high-risk areas e.g. Art, Science, PE	Head of Department

6 Duties of all members of staff

All staff will make themselves familiar with the principal requirements of the Health and Safety at Work etc, Act 1974 and other safety legislation and codes of practice which are relevant to the department in which they work. They should:

- take reasonable care of their own health and safety and any other person who may be affected by their acts or omissions at work;
- act in accordance with the requirements of this Health and Safety Policy.

All staff are expected to familiarise themselves with the health and safety aspects of their work and to avoid conduct which would put them or anyone else at risk.

In particular, all members of staff will:

- Seek to ensure health and safety regulations, rules, routines and procedures are being applied effectively by both staff and pupils;
- Seek to ensure that pupils are not allowed unauthorised access to laboratories, workshops, kitchens or areas such as a swimming pool;
- Seek to ensure that all plant, machinery and equipment is adequately guarded;
- Not make unauthorised or improper use of plant, machinery or equipment;
- Use the correct equipment and tools for the job and any protective equipment or safety devices which may be supplied;
- Seek to ensure that toxic, hazardous and highly flammable substances are correctly used, stored and labelled;
- Report any defects in the premises, plant, equipment and facilities which they observe;
- Take an active interest in promoting health and safety;
- Exercise their awareness, alertness, self-control and common sense at work.

7 Hirers, Contractors and Others

When the premises are used for other purposes than those under the direction of the Head then the Facilities Manager is in charge of the activities for which the premises are in use and will have responsibility for safe practices as indicated under Section 3 of this document.

The Facilities Manager will seek to ensure as far as reasonably practicable that hirers, contractors and others who use the school premises conduct themselves and carry out their operations in such a manner that statutory and advisory safety requirements are met at all times.

When the school premises or facilities are being used out of normal school hours for a school-sponsored activity, then for the purposes of this policy, the organiser of that activity, even if an employee, will be treated as a hirer and will comply with the requirements of this section.

When the premises are hired out to persons outside the employ of the school, it will be a condition for all hirers, contractors and all others using the school premises or facilities that they are familiar with this policy, that they comply with all safety procedures, rules and requirements of the School and that they will not without prior consent of the COO:

- Introduce equipment for use on the school premises;
- Alter fixed installations;
- Remove fire and safety notices or equipment;
- Take any action that may create hazards for persons using the premises or the staff or pupils of the school.

All contractors who work on the school premises are required to ensure safe working practices by their own employees under the provisions of the Health and Safety at Work, etc Act 1974 and to pay due regard to safety of all persons using the premises in accordance with this act.

In all instances where the contractor creates hazardous conditions and refuses to eliminate them or to take action to make them safe, the COO will take such actions as are necessary to prevent persons in his or her care from risk or injury.

All users of the school premises (including hirers and contractors) must note section 8 of the Health and Safety at Work, etc Act 1974, which states that no person shall intentionally or recklessly interfere with or misuse anything which is provided in the interests of health, safety or welfare in pursuance of any of the relevant statutory provisions.

8 Risk Assessment

Risk assessments are completed for any activity that might pose significant risk.

For some activities, such as the use of chemicals in science experiments, a formal risk assessment is provided by the supplier of the chemical, but to aid the use of this risk assessment, relevant departmental policies are written, and pupils are given individual precautions relevant to their experiment or activity.

The Heads and COO will seek to ensure as far as reasonably practicable that a full risk assessment survey of the premises is conducted annually. This survey will identify all defects and deficiencies, together with the necessary remedial action or risk control measures. The results of all such surveys will be reported to the Governors.

Please see the separate Risk Assessment Policy for further details.

9 Emergency Plans – Please see Emergency and Critical Incident Plan

Francis Holland Schools will take reasonable steps to ensure the safety pupils, staff and others on the premises in the case of fire or any other emergency.

10 First Aid

Francis Holland Schools will ensure that there are adequate numbers of first aiders, including paediatric first aiders, where necessary, available at all times when pupils are present on site and/or on school-arranged trips. For detailed information, including details of the qualified first aiders, see the Schools' separate First Aid & Accident Reporting Policy.

11 Accidents

Francis Holland Schools are aware of their responsibility for recording and reporting accidents to staff, pupils and visitors, including those reportable under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR). For further information, please contact the Facilities Manager or see First Aid & Accident Reporting Policy.

12 Work-related ill health

Francis Holland Schools will take reasonable care to ensure that the health of employees is not placed at risk. In doing so, the Trust will consider the risk of employees suffering from stress through, for example, hours worked, the allocation and organisation of work, the way people deal with each other, and the demands placed on staff.

All work-related ill health including work-related stress will be considered by the Director of HR as to whether the employee is advised to access occupational health services.

Details of the occupational health services can be found on FHS People.

13 Living safely with public health incidents

Schools will continue to manage the risks associated with public health incidents.

The Schools have in place procedures for responding to pupils who are ill and infections and will take all necessary steps to prevent the spread of infection and respond to illnesses and public health incidents.

The Schools will implement the following general control measures in response to public health incidents:

- ensuring good hygiene;
- maintaining appropriate cleaning regimes;
- keeping occupied spaces well ventilated;
- following public health advice on testing, self-isolation and managing confirmed cases.

Francis Holland Schools have risk assessments and procedures which are kept under regular review and these can be found on SharePoint. Like all risk assessments, these documents are 'living documents' and will be reviewed and updated as the circumstances and the public health advice changes.

Francis Holland Schools will assess risk reduction measures in the following priority order:

- elimination;
- substitution;
- engineering controls (e.g. design measures that help mitigate risk);
- administrative controls (e.g. floor markings or signage).

Personal protective equipment (PPE) should be used in line with UK Health Security Agency guidance.¹

Francis Holland Schools will actively monitor whether the controls in place are effective and working as planned.

14 Educational Visits

For further information, see Safety During Educational Visits Policy.

15 Repairs to Premises and Equipment

Any member of staff who notices a fault in any plant, machinery or equipment should immediately inform the COO and Facilities Manager. All staff have a statutory duty to report faults immediately.

¹ See paragraph 5.1 of DfE guidance (April 2022) Health and safety: responsibilities and duties for schools - GOV.UK (www.gov.uk)

16 Vehicle safety

Francis Holland Schools will ensure that there is adequate segregation of pedestrians, including pupils, staff and visitors, and vehicular traffic on and around the School sites. The Business Manager at FHP will ensure minibuss safety checks, section 19 and MOT checks, and risk assessments relating to minibuss activities are all kept up to date.

17 Electrical Safety

The Facilities Manager is responsible for advice to the COO on all matters relating to the policy on electrical safety.

A fixed electrical installation inspection is carried out annually on relevant electrical circuits. Portable Appliance Testing is carried out by outside contractors annually.

18 Fire Safety

The Facilities Manager is responsible for advice to the COO and Heads on all matters relating to Fire Safety.

The Schools have place appropriate fire detection and control equipment (for example, fire alarms, smoke detectors, fire blankets and/or fire extinguishers) which are in good working order.

Fire drills are carried out regularly and fire exits are clearly identifiable, and fire doors free of obstruction.

For detailed information, including the identity of the Fire Marshalls at the Schools, see the separate Fire Safety Policy and Fire Safety Procedure

19 Radiation Protection

The Radiation Protection Adviser is responsible for advising on all aspects of radiation.

Francis Holland School Regent's Park has appointed Imperial College Consultants, Faculty Building, Exhibition Road, London SW7 2AZ as its health and safety advisers on radiation protection.

Francis Holland School Sloane Square has appointed Guys and St Thomas' Medical Physics Department, 1st Floor, Tabard House, Guy's Hospital, London SE1 9RT as its health and safety advisers on radiation protection.

There is a dedicated separate storage area for radioactive sources.

20 Manual handling

Francis Holland Schools seeks to avoid the need for Manual handling (defined for the purpose of this policy as the transporting of loads by hand or using bodily force) wherever possible.

Where Manual handling cannot be avoided, we will seek to reduce the risks related to Manual handling by providing training and guidance in manual handling techniques in accordance with the Manual Handling Operations Regulations 1992.

21 Catering, Cleaning and Contractors

The Facilities Manager monitors Health and Safety policies for all contractors working at the School and ensures their insurance is up to date and sufficient.

22 Smoking and Vaping

Smoking is not allowed anywhere on school premises under the terms of legislation in force since July 2007. Vaping is also not allowed anywhere on school premises.

23 Legionella Control

The Facilities Manager is responsible for advice to the COO on all matters relating to Legionella control.

The Trust has a Water Management System in place. This includes a weekly flushing regime for low use outlets to prevent the stagnation of water, particularly during periods of low occupancy such as school holidays.

24 Asbestos Control

The Facilities Manager is responsible for advice to the COO on all matters relating to Asbestos control.

Asbestos surveys are carried out as needed and the Trust has a comprehensive Asbestos Management Plan and Asbestos Register in place for each School.

The condition of known asbestos containing materials is carefully monitored, measures are in place to ensure that anyone working on or near the asbestos containing materials is made aware of them, and emergency procedures are in place should any asbestos be accidentally disturbed.

25 Control of Substances Hazardous to Health (COSHH)

Facilities department: COSHH Risk assessments have been carried for all chemicals used by the school maintenance team.

Science: The Science department use CLEAPSS Hazards as the basis for assessing the risk for all chemicals they use. These form part of the risk assessments for each lesson. The department has suitable storage facilities in place for hazardous substances including separate metal cabinets for flammable substances, oxidising agents, acids and alkalis.

Art: The Art department has COSHH information at the point of storage for all chemicals that are used. COSHH risk assessments are in place for these.

Cleaning: The cleaning company (Xenon) carries out COSHH risk assessments for the chemicals they use on site.

Catering: The kitchen has a separate storage area for all cleaning chemicals. Accent, the catering company, carries out COSHH assessments for these.

26 Display Screen Equipment (DSE) safety

Please refer to the separate DSE policy within the Employment Manual.

The Trust provides appropriate DSE training where relevant. DSE assessments are undertaken as required, with reasonable adjustments made and specialist equipment provided as needed.

27 Work at height

The Trust will take all reasonable steps to ensure the health and safety of any person working at height in accordance with the Working at Height Regulations 2005.

28 Playground safety and areas out of bounds

School staff have a Duty Rota to ensure that adequate supervision is available at all times. Playgrounds are fully enclosed which helps to ensure safety. If Duty Staff identify an area of the school grounds or buildings that has become unsafe, they will report this to the Facilities Helpdesk and designate it 'out of bounds', and ensure it is not used until it is declared safe, following remedial work.

Areas of the school that should not be accessed by students are identified through H&S audits and risk assessment reviews and appropriate signage, instruction and supervision of pupils is in place to manage this risk.

29 Monitoring

We establish and monitor health and safety both actively and reactively. The Governing Body accepts overall responsibility for monitoring health and safety performance and for ensuring that the Schools meet the required health and safety standards.

At an operational level the Heads are responsible for, establishing, monitoring and reviewing health and safety measures, reviewing risk assessments, accident books / reports and accident investigations regularly and at least annually.

Reviews should include a review of health and safety related complaints and sanctions taken against employees and / or pupils for health and safety breaches and such reviews are reported to the COO. This allows the Trust to evaluate its performance to ensure that it is effectively managing risks.

As part of the monitoring process, the Trust will ensure that appropriate corrective action is being taken in response to any review and that learning has been shared and necessary improvements put in place.

30 Internal investigations

The COO is responsible for investigating accidents, incidents and work-related causes of sickness absences, if required. He may delegate such investigations to School staff, such as the Facilities Manager, Heads etc as appropriate. Such investigations may be required to discover the root causes of an accident, to prevent a recurrence, to discipline employees or pupils, to brief lawyers for the purpose of obtaining legal advice or to aid litigation and / or to actively monitor the effectiveness of this policy.

Francis Holland Schools will not sanction any internal investigation which may prejudice the investigations of outside agencies.

Where appropriate, the Trust will seek legal advice from solicitors before commencing an internal investigation. No admission of liability on the Trust's behalf shall be made without legal advice (if required) and prior agreement from insurers.

In the event of an accident or incident, the COO will consider whether it is appropriate to investigate and then give authority to commence an investigation and decide when the investigation will start.

Any internal investigation will be conducted fairly and objectively taking a systematic and structured approach to investigating the processes and systems.