DCS Directive 7.1.5

Safety, Health, Environmental and Fire (SHEF)

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General

Authorisation	Head DCS
Senior Responsible Owner	CEO MOD Schools
Point of Contact	SO1 Infra/SHEF SO3 SHEF Advisor
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Related Policy/Guidance	ACSO 1200: The Army's Safety and Environmental Management System JSP 375: Management of Health and Safety in Defence ACSO 9001: The Army Policy For Audit And Inspection In 2023 JSP 815 Vol 2 Element 2 DCS SOPs SHEF 01 – 04 ACSO 1118: Army Lessons Process JSP 456: Defence Catering Manual JSP 834: Safeguarding Children DCS SHEF Manual V009 DCS Directive 3.2.14: School Governance Committees

Introduction

The MOD is required by UK law, Defence policy, UK Strategic Command policy and Host Nation policy (References A - G) to minimise work-related fatalities, injuries, ill-health, and adverse effects on the environment from its activity.

Aim

The aim of this directive is to provide DCS HQ and Schools/Settings with clear guidance to ensure compliance with SHEF legislation and MOD policy.

Purpose

The Health and Safety at Work etc. Act 1974 requires DCS to provide a written policy directive for health and safety at work.

Scope

This directive applies to all individuals working for or on behalf of DCS. This Directive sets out the responsibilities on all individuals (in line with their contract of employment or other contractual arrangement). Whilst this does not apply specifically to pupils and other users of the schools and settings, DCS fully accept and understands their duty of care towards their health, safety and wellbeing is at the forefront of operations.

SHEF Statement of Intent

5.1 Head Teachers are responsible for the co-ordination of SHEF matters within their schools and designated areas. Day to day activity may be delegated to other staff (in writing) but accountability remains with the Head Teacher.

5.2 Head Teachers must, at the beginning of the school year, prepare and maintain the overall Site Hazard Survey JSP375 Vol 1 Chapter 8 and corresponding risk assessments, and communicate these to all personnel on the site.

5.3 This directive applies to all DCS locations. A paper copy must be held at each site and is to be used with the DCS SHEF Manual V009 to manage health and safety.

5.4 All staff are reminded that adherence to the requirements of this directive is a legal requirement, and that failure to do so may render the individual liable to prosecution. Objectives for safety performance will be published within the DCS SHEF Delivery Plan and assured by the DCS 1* Health and Safety Committee.

5.6 All levels of staff and managers will have access to appropriate training to ensure they act competently.

5.7 Safety equipment and PPE will be provided where risk assessments identify a need, and the organisation expects that the equipment and/or PPE is used.

5.8 Employees are expected to conduct their activities in a safe manner, and to report safety defects and concerns to their SHEF Coordinator.

5.9 DCS will review and audit the effective management of and adherence to the policy directive through annual self-assessments, review of any safety reports, relevant reports from assurance visits from other DCS departments, and formal DCS SHEF audits.

5.10 This directive is supported by Standard Operating Procedures. These can be found on SharePoint and MODNET.

5.11 This directive will be reviewed annually or sooner if there are changes e.g., working practice or legislation.

Actions required

6.1 Headteachers and other leaders must have a SHEF plan to control/mitigate risks and update the school Risk Register (escalating to DCS-SHEF and/or ACEO as required). Advice from DCS and local SHEF Advisers will underpin effective safety management, allowing risks to be owned and managed at the appropriate level. Further guidance can be found in the [DCS Risk Policy Directive](#) or [JSP 892.](#)

6.2 Measuring SHEF performance
SHEF performance in schools must be achieved by analysing the indicators detailed below:

(1) Leading Indicators:
- The extent to which internal plans and objectives have been set and achieved.
- The appointment of staff leads if not the Head Teacher.
- Trained personnel in SHEF roles (if delegated).
- Appropriate risk assessments matched to activity, risk or issue.
- Extent of compliance with control measures.
- Extent of compliance with statutory and regulatory requirements.
- Frequency and effectiveness of SHEF assurance activity (SGC representative visits and reports and recorded Head Teacher assurance).
- Personal protective equipment usage (e.g., first aid, D&T).

(2) Lagging Indicators:
- Unsafe acts and conditions reported (including near misses).
- Major occurrences and fatalities.
- Sickness and injury-related absences.
- Observations from assurance activity/ personnel/ SHEF officials

6.3 Environmental Protection (EP)
Whilst responsibility for a large component of EP sits with the Defence Infrastructure Organisation (DIO) as infrastructure providers and maintainers. DCS practices and procedures must be EP compliant.

6.4 Fire Safety Management (FSM)
All personnel are responsible for delivering FSM across the Army and for the protection of life. The details should be contained in the site Safety, Environmental Protection and Fire Plan. These must be reviewed annually and signed off by the Head Teacher.

6.5 Safety Governance
A member of the Schools Governance Committee should be appointed as the SHEF link governor. The SHEF link governor should meet termly with the school SHEF representative; and provide a written report to the SGC. All self-audits should be signed by the Head Teacher and counter signed by the SHEF link governor. Head Teachers and SHEF link governors must an active leadership role in understanding and managing SHEF risks.

6.6 Safe Systems of Work (SSW)
Safe Systems of Work must be identified for all activities, including routine activity. The SSW consists of:
- Safe Persons
- Safe Equipment.
- Safe Practice.
- Safe Place.

Further advice is available in the DCS SHEF Manual.

6.7 All Staff

Good SHEF performance is achieved by individuals at all levels, including teachers and support staff. This is particularly important if or when the situation is no longer covered by the planned risk assessment and requires a dynamic review and subsequent action.

All staff must be trained for their respective roles and understand how they are to be conducted safely. They have a duty to stop or pause activity if they feel it has become dangerous and is no longer controlled to the correct standard; this is particularly pertinent when (as detailed above) a situation has changed or a 'last minute good idea' becomes apparent. Whilst initiative and innovation are encouraged, due consideration must be given to the risks to personnel and the environment.

6.8 Personal safety

All civilian employees, contractors and visitors are to take reasonable care of their own safety and that of others who may be affected by their acts or omissions at work. The management of visitors to sites is contained within JSP 375, Vol 2, Chap 34. All occurrences (accidents, incidents, near misses, dangerous occurrences, serious equipment failures or unsafe practices) are to be reported in accordance with DCS SHEF/SOP/001-004.

6.9 Competence and Qualifications

Competence is a vital element of Safety. It is achieved by ensuring that all personnel, are qualified, experienced, and current to undertake the task or activity and are appropriately supervised if required. Mandatory training in relation to SHEF must be completed by all staff; additional training for employees with direct SHEF responsibility should be completed in accordance with course requirements and repeated to ensure currency.

6.10 Communication and Collaborative Effort

The '4Cs' principle of Co-ordination, Co-operation, Communication, and Control applies – see DCS SHEF Manual; and Risk Assessments must account for all user groups.

In addition to regular Safety meetings with staff who contribute to the SHEF management process in schools/settings, Head Teachers must conduct additional Safety assurance meetings prior to and after a major event e.g., Outdoor Visit, to ensure that risks are/were identified, effectively managed, lessons learnt and communicated effectively.

In addition to dedicated SHEF meetings, HQ Command Groups, School Governance Committees and School Leadership Meetings must have Safety as a standing agenda item to ensure that key safety issues are regularly communicated.

6.11 Assurance, Audit and Inspection

ACSO 9001 details the Army's Policy for Audit and Inspection (A&I). The School Governance Committee and the Head Teacher undertake the 1st Line of Defence Assurance (LODA) in relation to SHEF. 2nd LODA is undertaken in location by DCS SHEF auditors (who may be supported by RC SHEF officers). The bi-annual 1* SHEF Assurance Board provides 2nd LODA for all DCS activity. 3rd LODA is covered by the Army Safety Centre.

6.12 Accident Investigation

DCS employs a supportive investigative approach to all safety occurrences. See **DCS/SHEF/SOP/003**. Responsibility for investigating all MOD fatalities and some serious

occurrences falls to the Defence Accident Investigation Branch (DAIB). DCS has published **Standard Operating Procedures** for each stage of occurrence reporting and investigation.

6.13 **Learning Lessons**

It is vital that SHEF lessons are learnt at the lowest levels, particularly from near misses that often precipitate more serious accidents and offer genuine opportunities to learn. DCS will demonstrate that it is a Learning Organisation in relation to SHEF occurrences by including key messages in regular internal communications. Safety lessons are tracked, managed, and closed in accordance with ACSO 1118 and led by the Army Safety Centre through the SO1 Safety Lessons and Investigations.

6.14 **Fire Risk Assessments (FRA)**

It is a legal requirement that all buildings must have an FRA. These are delivered on by Capita Fire and Rescue and managed through the Defence Assure System. DCS SHEF Staff will be able to provide FRA information to establishments/schools on request.

6.15 **Environmental Health**

All environmental health occurrences (such as incidents involving asbestos, air quality, legionella or infection control) will be conducted by the Army's Environmental Health Practitioners (EHP) who are part of Army Health. The requirement and conduct of EHP investigations will be initiated, coordinated, and conducted by the EHPs within respective Commands. Where there is a need for an inter-Command investigation this will be coordinated through the Army Safety Centre in conjunction with Army Force Health Protection.

6.16 **MOD Claims**

From time-to-time claims may be raised against the MoD following an accident where injury or loss has occurred. There is a clear legal requirement to provide documentary evidence to support MoD/other Solicitors in reviewing these claims. Units are often approached for copies of documentary evidence by such solicitors. It is important to note that Units or Establishments **must not** accept any responsibility for processing an individual's claim, or say anything that might be **construed as accepting, admitting, or denying liability** for the occurrence giving rise to the claim. Schools should refer the requesting solicitor to the Army Reporting Cell (ARC) for the release of any documentation.

Responsibilities

7.1 The duties for DCS School Governance Committees include the quality assurance of:
- Health and safety compliance
- Appointment of a link SHEF governor
- Working with senior leaders to ensure that safeguarding procedures are robust, and the school provides a safe and healthy environment for pupils and staff.
- SHEF link governor to provide a regular written health and safety update to the SGC committee.
- The SGC are not responsible for the Health and Safety management systems.

7.2 The Head of DCS has overall responsibility for health and safety on a day-to-day basis, this includes:
- Delegating all aspects of operational SHEF management to AH(SIS)
- Bringing to the attention of Regional Command any significant issue or challenge that might affect the DCS, its employees or pupils.
- Ensuring sufficient resources are made available to ensure statutory compliance and achieve DCS's health and safety objectives.

- Promoting and maintaining a positive health and safety culture across DCS and all its activities.
- Ensuring matters affecting health, safety and welfare are communicated effectively across DCS.
- Ensuring health and safety is a standing agenda item for monthly Command Group meetings.

7.3 DCS COS fulfills the role of SHEF Champion who shall:
- Establish and promote a safety culture across DCS.
- Oversee and monitor the activities of subordinate Risk Owners in order to provide advice and guidance.
- Chair SHEF committees in absence of Hd DCS.
- Provide 1st LoDA of activity within DCS HQ as required.
- Ensure and assure that the Safety Risk Management (SRM) processes are applied to all activity within DCS.
- Assure that SHEF risk is appropriately managed during the conduct of activity for which they have oversight.
- Maintain a record of all dispensations they have authorised or escalated outside of the QPRR process.
- Where appointed conduct the roles and responsibilities of the 'Risk Owner.'
- Where appointed conduct the roles and responsibilities of the 'Activity Owner.'

7.4 The Headteacher shall:
- Follow MOD policy and DCS policy directives in respect of SHEF.
- Establish an operational SHEF team within their establishment and provide written delegation accordingly.
- Ensure adequate local resources are provided to manage SHEF.
- Publish the DCS SHEF Statement of Intent by displaying on the Health and Safety noticeboard and bring to the attention of staff; and contractors and visitors on arrival.
- Ensure that all new employees are briefed about SHEF arrangements; in particular to ensure that they have read and understood the MOD SofS Safety Health and Environmental Protection Policy Statement and the DCS SHEF Statement of Intent.
- Complete and sign off all annual SHEF audits, monthly, weekly and daily safety checks, facilitate HQ audits and provide documentary evidence of local SHEF activity as required.
- Ensure that the DCS system for reporting, recording and investigating occurence (accidents and 'near misses') is communicated to all staff and fully implemented.
- Ensure all SHEF instruction, advice and updates issued by DCS are communicated to all staff and that receipt is recorded by signature and retained in SHEF records.
- Ensure that Risk Assessments are or have been carried out and recorded and that the controls, precautions and preventative measures that have been derived by these risk assessments are made known to all staff and fully implemented.
- Facilitate the implementation of risk reducing measures as soon as is reasonably practicable and take all necessary short term measures to avoid danger pending rectification.
- Ensure that all SHEF related inspections are carried out as per schedule and a written record is kept of the results of such inspections.
- Ensure that there are effective arrangements in place for dealing with emergencies, and that these arrangements are regularly rehearsed.
- Ensure there is are Personal Emergency Evacuation Plans (PEEP) in place for any employees or pupils that requires one.

- Ensure that an assessment of first aid needs is conducted and that there are sufficient trained first aiders (according to the number of children and adults in the building); that first aid arrangements are known to staff and that first aid materials are 'in-date' and readily available to all staff, visitors and others on the premises.
- Ensure that all visitors, including contractors, are informed of any hazards on site of which they may be unaware.
- Ensure the use of any necessary protective clothing and equipment that has been identified by risk assessment and that it is properly stored, maintained and renewed when required.
- Ensure that there are effective channels for staff to report any possible hazards and any health and safety concerns to the local SHEF team (including the SGC link governor).
- Ensure that staff receive any necessary SHEF training and if necessary, to draw SHE training needs to the attention of the DCS SHEF team.
- Actively monitor and review the implementation and effectiveness of the Head of Establishments' SHEF activity and record keeping; and report findings to the DCS SHEF team.
- Contribute to the quarterly DCS QPRR process and the bi-annual DCS SHEF Assurance Board submission for DCS Schools and Settings Submission.

7.4 Heads of Departments shall:
- Ensure that all staff, temporary staff, ancillaries and voluntary helpers are aware of the requirements of the Department/Section SHEF procedures, risk assessments and the safe working practices that apply to the area of activity.
- Actively promote Health, Safety, Environmental and Welfare matters to staff and pupils.
- Make known to the Head Teacher any identified training needs, the local SHEF coordinator or the DCS SHEF team can advise if necessary.
- Establish and regularly review safe working practices for activities under their control.
- Ensure that no activities are carried out in their areas of responsibility that could result in people being exposed to hazards that could harm them unless there are suitable and sufficient risk assessments in place and the protective and preventative measures that are derived from these assessments are fully implemented.
- Check that the risk reduction measures that are in place are effective and are understood by those who are at risk.
- Take effective action and/or refer up the line management chain immediately any SHEF problems brought to their attention. This includes the stopping of any practices or the use of any tool, equipment etc which are considered unsafe, until satisfied as to their safety.
- Carry out regular and documented SHEF checks of the area and activities under their control and where necessary submit reports to the Head Teacher/SHEF Coordinator with findings and recommendations.
- Ensure that all items of portable electrical equipment (including new purchases) are entered on the School Electrical Register before use, and that visual inspections of all equipment take place on a term basis. Defective equipment must be taken out of service until repaired or replaced.
- Check the adequacy of fire precautions and monitor practice evacuations for their area of control. Any problems noted during evacuation should receive immediate attention.
- Ensure that the health and safety training needs of personnel are met and that training records are maintained.

- Ensure investigations of accidents or incidents involving staff, pupil or visitors are conducted. Reports are to be submitted to the Headteacher with findings and recommendations to prevent a recurrence.
- Keep up to date with new developments in health and safety in their specialist area of activity and advise the Head Teacher of any need for changes.

7.5 Employees are responsible for:
- Taking reasonable care of the health and safety of themselves and others (including colleagues, pupils, and visitors) that may be affected by their acts or omissions.
- Familiarising themselves and following all DCS health and safety policies.
- Ensuring that where required risk assessments are undertaken for activities within their area of responsibility, appropriate controls are put in place and safe methods of working adopted.
- Ensuring that all accidents, incidents and near misses are reported at the earliest opportunity.
- Promoting and maintaining a positive health and safety culture.
- Ensuring that any specialist equipment is maintained in accordance with legislative requirements and/or manufacturer's instructions as appropriate and records kept.
- Ensuring that written safe systems of work are followed for all learning/work related activities where appropriate.

7.6 The DCS SHEF team are:
- the focal point of the DCS commitment to health and safety. Copies of all relevant documentation and guidance on legislative compliance are held, either in paper copy or electronically and amended as necessary.
- The team will liaise with Regional Command SHEF to enable DCS to participate in meetings, discussions, and conferences with the intention of ensuring that the best ideas, systems, and procedures are implemented to the benefit of DCS, its employees, its pupils and others who may be affected by its operations.

7.7 DCS will communicate information relating to health and safety matters to staff through various channels including:
- A suite of supporting policy directives and Standard Operating Procedures (SOP)
- Ad hoc communication through the weekly email bundle to schools, Friday Letter, DCS Back Brief and DCS Newsletter.
- Schools and settings (on behalf of DCS) will display health and safety signage throughout their location and **The Health and Safety Law 'what you should know' poster** must be displayed on the Health and Safety noticeboard.

Risk Assessments

8.1 The Management of Health and Safety at Work Regulations and other Regulations require that risk assessments are carried out by employers and that the significant findings from the assessments are brought to the attention of those at risk. Within the DCS environment this includes the risks to employees, pupils and others with whom DCS has contact during the course of its business activities.

8.2 Risk assessments are to be recorded on Army form 5010 and stored electronically in the location's folder in the SHEF domain of the DCS SharePoint on MODNET. Where activities/tasks are not the subject of an existing risk assessment and could lead to significant harm occurring, a specific activity/task risk assessment will be required to be undertaken. Advice and training for completing risk assessments is available through the DCS SHEF team. Details of required risk assessments can be found in the DCS SHEF Manual.

Work Equipment

9.1 All tools and equipment provided by DIO for use at work will comply with the requirements of the Provision and Use of Work Equipment Regulations (PUWER).

This includes ensuring that:
- All users of products and articles supplied or hired for use at work are provided with relevant health and safety information.
- All work equipment hired or purchased for use by our employees or pupils is suitable for the purpose for which it is to be used and that employees have received appropriate information, instruction and training.
- Reasonable steps are taken to ensure that plant and equipment used or operated by sub-contractors who are under the control of the school, is used in compliance with current legislation and good practice.
- Necessary arrangements are in place so that all work equipment is properly maintained, and that records of servicing, inspection, calibration and statutory tests/examinations are completed and available.

Examples of records required include:
- Plant certification and inspections
- Portable electrical appliance testing and fixed electrical inspections
- Statutory examination/test of lifting equipment and routine inspections
- Employees are responsible for ensuring that any defects likely to affect personal safety or health are reported immediately and are required to carry out a visual inspection of equipment before use to ascertain that it is in good repair and appropriate for the task.
- Electrical Equipment Inspection and Testing (EEIT) will be conducted by competent persons.

Information, Instruction and Training

10.1 Suitable information, instruction and training is to be provided to employees and such other persons as necessary on health and safety related matters. These will be identified during risk assessment, on the introduction of new technology, or a change in working methods, or through knowledge gained from premises and site inspection.

10.2 Safety training requirements for both managers and employees will be identified, recorded, and provided to all employees, as necessary.

10.3 The Head Teacher (and Heads of Department for subject specific training) are responsible for identifying training needs.

First Aid

11.1 To comply with the Health and Safety (First Aid) Regulations, all school sites will be supplied with adequate first-aid facilities. A First Aid Needs Assessment First Aid Needs Risk Assessment Template must be conducted annually and any findings implemented immediately.

11.2 School staff are trained to be the first responder for first aid incidents and are trained to 'First Aid at Work' and 'Paediatric First Aid' standards.

11.3 Automated External Defibrillators (AED's) can be used (if they are available and required).

11.4 When a school First Aider decides that a casualty should be taken either to hospital or home, they must be transported:

- By ambulance when the casualty's condition is or is thought to be serious. When a casualty is transported by ambulance, school First Aiders or other staff may be required to accompany them.
- By school transport when available and when the casualty's condition is not serious. When transported by school transport casualties must be accompanied by a school First Aider as well as by the driver.
- Following registration at the hospital with medical staff, the First Aider may determine if they need to remain with the injured person or can return to previous duties, taking account of the casualty's trauma, personal circumstances etc.
- By a parent or carer of the injured person, if the care of the child has been transferred to the parent or carer.

Health Surveillance

12.1 The MOD provides occupational health reporting through OPTIMA. It is a line managers responsibility through the risk assessment process to contact OPTIMA if hazards have been identified.

Display Screen Equipment (DSE)

13.1 DCS will comply with the Health and Safety (Display Screen Equipment) Regulations and where anyone is identified as a Display Screen User, Line Managers will ensure that those persons undertake a workstation assessment. DSE assessment is to be completed using MOD form 5013 and can be accessed via the SharePoint portals. DSE mandatory training is to be completed via the DLE.

13.2 Where the assessment identifies that equipment or furniture, such as keyboards, computer mouse, chairs etc. would reduce the risk of harm coming to the DSE user these are to be provided following an OPTIMA evaluation.

13.3 All employees identified as DSE users are entitled to eye tests on request in accordance with the Display Screen Equipment Regulations.

Smoking

14. In line with the MOD policy, smoking is prohibited on all school premises. The smoking ban applies to all staff, pupils, contractors, and visitors.

Lone Working

15.1 DCS seeks to avoid lone working wherever possible, however recognises that on rare occasions this may be required. However, regular planned lone working will only be allowed after a risk assessment has been carried out to assess the nature of the work, the workplace, and the specific risks to the lone worker. Where it is not possible for the work to be done safely by one person, arrangements will be made to provide back up and assistance. All employees who lone work will be given instruction and training on recognising the risks, the precautions to be taken and the procedure for requesting assistance.

Control of Substances Hazardous to Health (COSHH)

16.1 COSHH assessments will be undertaken for any work with substances using MOD Form 5011 where a risk has been identified through the safety data sheets.

16.2 DCS will look to eliminate exposure to hazardous substances but where this is not possible will adopt control measures to reduce the risk to as low as reasonably possible – see [DCS SHEF Manual V009](#)

Legionella

17.1 DIO is responsible for ensuring that a suitable and sufficient risk assessment is carried out to assess the risk of exposure to legionella bacteria from activities and water systems on DCS premises. DIO are contracted to conduct planned and reactive maintenance works throughout schools, and in consultation with the Estates Team, conduct the monitoring regimes i.e., temperature monitoring, to reduce the risk of bacterial growth in the school water systems. Head Teachers may be required to ensure that mitigations are regularly implemented e.g., running of showers following a period of closure

Asbestos

18.1 DCS recognises its duties under the Control of Asbestos Regulations to prevent exposure to asbestos, where reasonably practicable, however DIO are responsible for:
- Identifying premises that may contain asbestos.
- Maintaining an asbestos register.
- Ensuring asbestos surveys are conducted by a competent surveyor on all properties within their control built before 2000.
- Developing and implement asbestos management plans based on any survey findings.
- Providing information to anyone who might come into contact with asbestos (e.g., contractors).

18.2 Where the presence of asbestos is suspected, it MUST be assumed that it is present, and DIO informed immediately.

Manual Handling

19.1 Manual handling operations will be avoided wherever practicable by automating or mechanising handling. Where manual handling cannot be avoided and there is likely to be a significant risk or injury, specific assessments will be made by the appropriate manager, used MOD Form 5012.

Working at Height

20.1 Working at height should be avoided. Where this is not possible or practicable, working at height is to be properly planned, organised, and supervised.

20.2 Where working at height is unavoidable e.g., putting a box on a shelf, appropriate equipment will be provided. Steps, stepladders and footstools will be recorded on a register and will be subject to inspection by the Line Manager.

20.3 DIO are contracted to conduct planned and reactive maintenance works throughout schools will be tasked with the work having provided appropriate and sufficient risk assessments.

Noise

21.1 There are a number of different areas within the DCS environment in which employees and pupils might be working, where exposure to noise might need to be considered:
- Performance spaces
- Construction environments

- Workshops

21.2 When operating or working near plant machinery or other noise sources, employees are required to:
- Keep machinery covers closed.
- Wear suitable hearing protection as identified in the risk assessment.

21.3 Information and instructions for safeguarding hearing will be given to staff and pupils as required.

21.4 Where permanent noise hazards are identified, 'Hearing Protection Zones' will be designated, and the use of appropriate control and protection measures enforced.

21.5 Where there are concerns that noise within areas of DCS may reach the noise action (exposure) levels, the DCS SHEF team will engage the Environmental Health Team to complete an independent noise assessment.

Food Safety

22.1 DCS has a legal duty to comply with the provisions of The Food Safety Act 1990, and all other subsequent, or relevant, legislation made under the Act.

22.2 DCS is committed to identifying potential food safety hazards and will implement any control measures necessary to reduce the risks to customers of our food outlets.
Each outlet will have a comprehensive risk-based quality management procedure based on the principles of Hazard Analysis and Critical Control Points (HACCP) to ensure all practicable due diligence and the maintenance of our high standards.

22.3   These procedures include procurement, delivery, storage, preparation, and service. To achieve this, the following conditions must be observed:
- All food will be produced under hygienic conditions that do not expose the food or food contact surfaces to risk of contamination.
- Food contact surfaces and equipment will be kept clean and sanitised.

22.4 All staff and pupils must maintain a high standard of personal cleanliness and wear the correct protective clothing at all times. Staff or pupils who are aware they are suffering from any infection or condition likely to cause food poisoning either directly or indirectly must report to their Line Manager, Class Teacher or Tutor immediately. Staff and pupils involved in preparation and service of food must observe all school/setting hygiene procedures.

22.5 All food will be stored and processed under safe conditions and within the specified range of temperature according to statutory requirements and recommended approved guidance

Work Placements and Apprenticeships

23.1 Whilst DCS must always satisfy itself that suitable health and safety arrangements are in place, it must also be recognised that the primary responsibility for managing any significant risks and the safety of a pupil on any type of work placement lies with the host employer.

23.2 An "Employer Health & Safety Declaration" must be obtained prior to any student commencing their work placement/apprenticeship, ensuring that the environment complies with all relevant safety regulations.

23.3 All placements will be subject to monitoring visits, carried out by the assessor to observe pupils in the workplace and to check that the work environment is in accordance

with the agreed standards. The assessor will also ensure that there are sufficient on-going arrangements in place for providing information, instruction, and guidance for the student for securing their health and safety welfare. All placements will be subject to a Workplace Health and Safety Assessment for quality and auditing purposes.

23.4 No arrangements for work experience should be made without the knowledge of the DCS Training Assessment and Careers Team leader.

Work Related Violence

24.1 DCS will not tolerate work-related violence, including verbal abuse, to any member of staff. No member of school or setting staff will be expected to tolerate work-related violence caused by a pupil, visitor, or member of the public, without action. All members of staff have the right to expect that the schools or setting is a safe place to work.

Definitions

Assurance	Assurance is an evaluated opinion, based on evidence gained from review of an organisation's governance, risk management and internal control framework.
Audit	An audit is a systematic, independent, and documented process for obtaining objective evidence and evaluating it. All audit activity should be focused on providing advice and assistance to Head Teachers and HoE, identifying areas of risk that will inform their risk management process; audit should encourage good practice and inform a continuous improvement cycle.
Inspection	An inspection is a formal examination or review of performance and outputs, designed to assess effectiveness and to ensure fitness for purpose and defined as a 'determination of conformity to specified requirements. The requirement for inspection will normally be imposed by national or international legislation or by a licensing authority in order to license an activity, capability, or facility. Unlike an audit, it is objective. An inspection usually results in a pass/fail grade and should be carried out by an SME.
Assurance (LODA)	Assurance - Lines of Defence Assurance (LoDA) provide the framework for identifying the overall level of assurance provision. • 1st LoDA is Self-Assessment: 1st party (internal) assurance conducted by those responsible for delivering output. • 2nd LoDA HQ Assurance on behalf of TLB: 2nd party assurance is conducted by DCS HQ to provide CoC oversight to ensure compliance and is achieved through audit of the effectiveness of control of risks and internal frameworks. • 3rd LoDA is Independent Assurance: 3rd party assurance is conducted by an organisation that is separate from the activity or output being assured.