

Health and Safety Policy
Nursling C of E Primary School
Date of Issue: March 2017
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STATEMENT OF INTENT

It is our policy to carry out our activities in such a way as to ensure, so far as is reasonably practicable, the health, safety and welfare of our employees and all persons likely to be affected by our activities including the general public where appropriate. We co-operate and co-ordinate with partnerships, contractors, sub-contractors, employers, Hampshire County Council departments and the occupiers and owners of premises and land where we are commissioned to work in order to pursue our Health and Safety Policy aims.

Our aims are to:

- Provide and maintain a safe and healthy working environment ensuring the welfare of all persons
- Mitigate health and safety risks arising from our activities
- Comply with statutory requirements
- Consult with all staff on matters affecting their health, safety and welfare
- Provide and maintain safe systems, equipment and machinery
- Ensure safe handling, storage and use of substances
- Provide appropriate information, instruction and supervision
- Ensure staff are suitably trained and competent to do their work safely
- Continually develop a safety culture to remove or reduce the possibility of accidents, injuries and ill-health
- Assess risks, record significant findings and monitor safety arrangements
- Review and revise safety policies and procedures periodically and when circumstances may introduce a requirement to amend or improve arrangements
- Develop and maintain a positive health and safety culture throughout the school by regular communication and consultation on health and safety matters

Our Health and Safety management system has been developed to ensure that the above commitments can be met. All staff and governors are instrumental in its implementation.

ORGANISATION

Employer Responsibility

The overall responsibility for Health and Safety at the premises of Nursling Church of England Primary School is held by the Full Governing Body in conjunction with the Local Authority, who:

- Ensure that health and safety has a high profile
- Ensure adequate resources for health and safety are made available
- Consult with the Head-teacher regarding health and safety requirements & arrangements
- Periodically monitor and review local health and safety arrangements

The Governing Body devolve responsibility for the review and monitoring of this Policy to the Environment, Finance & Resources Sub-Committee and to the Head-teacher for ensuring implementation of the Policy.

The Governing Body recognise a duty of care to staff as part of their employment, to pupils as participants of activities under the management of employees of the school and to other members of the general public (including parents, volunteers and visitors) attending the school or participating in activities of the school.

The Governing Body recognise a duty of care upon the organisation to co-operate with other employers (eg contractors, service providers, etc) in order to provide an overall safe working environment.

The Head-teacher

The responsible manager for implementation of this Policy is the Head-teacher who acts to:

- Develop a safety culture throughout the school
- Consult with staff and volunteers, and provide information and opportunity for training and instruction so that staff and volunteers are able to perform their various tasks safely and effectively
- Assess and control risks associated with activities as part of everyday management
- Ensure a safe and healthy environment and provide suitable welfare facilities
- Make operational decisions regarding health and safety
- Ensure periodic safety tours and inspections are carried out
- Ensure significant hazards are assessed and risks are managed to prevent harm
- Ensure staff and others are aware of their health and safety responsibilities
- Inform the Governing Body of significant Health & Safety concerns
- Produce, monitor and periodically review all local safety policies and procedures by ensuring a risk register, risk assessments and systems of work are maintained.

All Staff (including volunteers)

All Staff & Volunteers have a statutory obligation to co-operate with the requirements of this policy and have a duty of care in respect of their own health and safety and that of others, particularly pupils under their care, by:

- Supporting the school health and safety arrangements
- Ensuring their own work area remains safe at all times
- Not adversely affecting health and safety arrangements or misusing equipment

- Complying with all safety procedures, whether written or verbally advised, for their own protection and the protection of those who may be affected by their actions
- Reporting safety concerns to the Head-teacher and at staff meetings.
- Reporting any incident that has led, or could have led to damage or injury
- Assisting in the investigation of accidents, dangerous occurrences or near-misses
- Not acting or omitting to act in any way that may cause harm or ill-health to others

The Teaching Staff have a particular duty of care towards pupils by:

- Ensuring an immediate safe environment
- Demonstrating Health & Safety in everyday activities
- Being aware of the individual understanding, skills and competences of pupils towards Health & Safety in the various activities undertaken
- Being attentive to the actions of volunteers and trainee members of staff
- Reporting accidents, incidents and taking appropriate action

The Administrative and IT Support Staff are best placed to assist the Head-teacher and others in the:

- Health & Safety of visitors to the premises
- Induction of new staff, volunteers and others in health & safety arrangements
- Initiation of the monitoring of generic Health & Safety procedures

The Caretaker has particular responsibility for the Health & Safety associated with the premises and for undertaking a range of health and safety related duties on behalf of, and under the direction of the Head-teacher. The Caretaker works in accord with the training received, risk assessments and agreed safe working practices. The Caretaker is responsible for the supervision of the cleaning staff and the cleaning duties undertaken. The Caretaker works within their level of competence and seek appropriate guidance and direction from the Head-teacher and/or the Children's Services Health & Safety Team as required.

Health & Safety Committee

Health & Safety is a standing item for both the Staff Meeting, held weekly, and the Environment, Finance & Resources Committee which is held once per term. The Staff Meeting enables all staff to be kept informed of all changes in Health & Safety practices, procedures, new guidance, accidents, incidents and risk related matters. The meeting also provides the opportunity for staff to raise H & S issues. The Environment, Finance & Resources Committee is the forum at which governors receive monitoring reports, discuss unresolved Health & Safety issues, discuss and develop related policies and receive Health & Safety monitoring reports. All Health & Safety policies are ratified at the meeting of the Full Governing Body.

Fire Safety Co-ordinator

The fire safety co-ordinator who is the competent person for fire safety on the premises. This is Lindsay Manning and she is booked onto training in the summer term 2017. She attends the fire safety co-ordinator training course and refreshes this training every three years. The fire safety co-ordinator is responsible for the local management and completion of day-to-day fire safety related duties and upkeep of the fire safety manual.

The fire safety co-ordinator works within their level of competence and seeks appropriate guidance and direction from the responsible manager/headteacher and/or the Children's Services Health & Safety Team as required.

Health & Safety Representative

Caroline Goodman is the Health and Safety Representative, however all staff promote a positive safety culture throughout the organisation and carry out the health and safety duties appropriate to their role in accordance with current guidance and legislative requirements. Health and Safety is an agenda item for every weekly staff meeting where issues raised are followed up at the subsequent meeting.

Legionella Competent Person

The Caretaker is the nominated competent person for Legionella on the premises and acts on behalf of the Headteacher to provide the necessary competence to enable Legionella to be managed safely. He/she completes the Legionella e-learning course annually and all training records are retained.

The Legionella competent person ensures that all periodic and exceptional recording, flushing, cleaning and general Legionella management tasks are correctly completed and recorded in accordance with departmental and corporate requirements. He/she advises the Headteacher of any condition or situation relating to Legionella which may affect the safety of any premises users. He/she works within their level of competence and seeks appropriate guidance and direction from the Headteacher and/or the Children's Services Health & Safety Team as required.

Asbestos Responsible Person

The Administrative Officer and Caretaker are the nominated competent persons for asbestos on the premises and act on behalf of the Headteacher to provide the necessary competence to enable asbestos to be managed safely. They complete the asbestos e-learning course annually and all training records are retained.

The asbestos competent persons ensure that all staff have a reasonable awareness of asbestos management and dangers. They ensure that the appropriate staff are competent in the use of the asbestos register and that asbestos is managed in accordance with departmental and corporate requirements. They advise the Headteacher of any condition or situation relating to asbestos which may affect the safety of any premises users. They work within their level of competence and seek appropriate guidance and direction from the Headteacher and/or the Children's Services Health & Safety Team as required.

Accident Investigator

The on-site trained accident investigators lead on all accident investigations in accordance with school and corporate procedures. Chris White is booked onto training on the summer term 2017.

ARRANGEMENTS

The following arrangements for health and safety have been developed in conjunction with the recommendations of the Local Authority and in accordance with the Management of Health and Safety at Work Regulations (1999). These arrangements set out all the health and safety provisions for *Nursling*

Church of England Primary School and are to be used alongside other current school procedures and more detailed policies (see Work Procedures for H & S).

It is understood that contractors and other service providers undertaking activities on the premises do so under the express permission of the Head-teacher, or by provision of a service level agreement which recognises a duty of care in respect of Health & Safety and that safe systems of work and procedures are adopted. It is a requirement that any incident, accident or unsafe situation is reported by the contractor or service provider to the Head-teacher.

In carrying out their normal functions, it is the duty of all managers and staff to act and do everything possible to prevent injury and ill-health to others. This is achieved in so far as is reasonably practicable, by the implementation of these arrangements and procedures.

Accident/Incident Reporting & Investigation

The on-site management, reporting and investigation of accidents, incidents and near misses is carried out in accordance with departmental and corporate policy requirements.

Any accident, incident or injury involving children, staff, visitors or contractors is reported and recorded on the Hampshire Health and Safety Website. Minor injuries are recorded on the school accident book.

All significant accidents, incidents and near-misses are immediately reported to the Head-teacher. The trained accident investigator conducts a documented investigation into more serious incidents. The purpose and intended outcome of the investigation is to identify the immediate and underlying causes of the accident so as to be able to implement appropriate measures to prevent reoccurrence.

The HCC online accident investigation report tool is used for the recording/reporting of investigations. The Head-teacher ensures that the Governing Body is appropriately informed of all incidents of a serious nature. All accident/incident reports are monitored by Environment and Resources Committee for trend analysis in order that repetitive causal factors may be identified to prevent reoccurrences.

Premises hirers and community/extended service/third party users must report all incidents related to unsafe premises or equipment to a member of the school staff, who appropriately report and investigate each incident. Incidents related to the user's own organised activities are reported by them in line with their own reporting procedures.

Administration of Medicines

Arrangements regarding medicines are set out in the Administration of Medicines Policy.

Asbestos Management

Asbestos management on site is controlled by the asbestos competent persons. The asbestos register, as issued by PBRs, is located at the school office and is shown to all contractors who may need to carry out work on site. Contractors must sign the register as evidence of sighting prior to being permitted to commence any work on site.

Any changes to the premises' structure that may affect the asbestos register information are notified to PBRs in order that the asbestos register may be updated accordingly.

Under no circumstances must staff drill or affix anything to walls that may disturb materials without first checking the register and/or obtaining approval from a competent person. The asbestos register is signed before commencement of work.

Any damage to any structure that possibly contains asbestos, which is known or identified during inspection, must be immediately reported to the Headteacher and/or Asbestos Competent Person who immediately acts to cordon off the affected area and contact the PBRs Asbestos Team for guidance. Any contractor suspected to be carrying out unauthorised work on the fabric of the building is immediately stopped from working and immediately reported to the Headteacher and/or asbestos competent person.

Child Protection

Arrangements regarding child protection are set out in the Child Protection Policy.

Community Users/Lettings/Extended Services

The responsible Headteacher ensures that:

- Third parties and other extended service users operate under hire agreements
- A risk assessment for the activity is completed using RATF-047A or RATF-047B
- The premises is safe for use and is always inspected prior to, and after each use
- Means of general access and egress are safe for use by all users
- All provided equipment is safe for use
- Fire escape routes and transit areas are safe and clear of hazards
- Hirers/users are formally made aware of fire safety procedures and equipment

Contractors on Site

HCC approved contractors are used whenever practicable for contractual work on the premises. Where non-HCC approved contractors may be required or selected for use then appropriate safe selection procedures are used to ascertain competence prior to engaging their services. The departmental CSAF-013 Safe Selection of Contractors Checklist is used to determine competence of non-HCC contractors who require adequate risk assessments to demonstrate their safe working practices for specific work being undertaken.

All contractors must report to the school office where they are asked to sign the visitors book and asbestos register and read health and safety procedures. All contractors must be issued with the local written contractor induction brief that includes all relevant details of fire safety procedures & local safety

arrangements. A contractor may commence work and bring equipment, vehicles, etc onto the premises once permission has been granted.

Staff are responsible for monitoring work areas and providing appropriate supervision, more so where the contractor's work may directly affect staff and pupils on the premises.

Curriculum Activities

All safety management and risk assessments for curriculum based activities are carried out under the control of the relevant member of staff using the appropriate codes of practice and safe working procedural guidance for Design & Technology, Science, Music, Physical Education & Sport, Art, Swimming and Drama as issued by CLEAPSS, HIAS and Hampshire County Council. Subject Managers are responsible for local risk management and ensuring that maintenance of equipment and premises in their areas of the curriculum are managed safely following the appropriate guidance.

Display Screen Equipment

All members of staff defined as DSE users must complete the *display screen equipment e-learning course* every year without exception. All users must carry out periodic workstation assessments using CSAF-001 Workstation Assessment Form. Workstation assessments are actioned as necessary and routinely reviewed at intervals not exceeding three years.

Electrical Equipment

The Headteacher ensures that:

- Only authorised and competent persons are permitted to install or repair equipment
- Where 13-amp sockets are in use, only one plug per socket is permitted
- Equipment is not used if found to be defective in any way
- Defective equipment is reported to the Headteacher and immediately taken out of use until repaired
- All portable electrical equipment is inspected / tested at the prescribed intervals. Equipment testing/inspection can only be carried out by a competent person.
- The competent person to be used is Hooper Services. Private electrical equipment is not brought onto the premises or used unless its use is approved by the Headteacher and it has been tested
- New equipment must be 'CE' marked and advised to the Headteacher in order that it can be added to future PAT testing schedules

Any defective or suspected defective equipment, systems of work, fittings etc must be reported to the Caretaker in book located in staffroom and attended to as soon as possible.

Emergency Procedures

General emergency evacuation for non-fire related emergencies is carried out in accordance with the school emergency evacuation plan. The school has a fire emergency plan for fire related emergencies and an emergency evacuation plan for all non-fire emergencies.

All staff receive a brief and/or a copy of the emergency evacuation plan at induction and are periodically provided with updated information as the emergency evacuation plan is routinely reviewed and amendments introduced.

Personal Emergency Evacuation Plans are completed, provided and exercised for vulnerable persons to be able to ensure safe, assisted evacuation in the event of an emergency incident.

Extreme Temperatures

If during the summer months Hampshire County Council alert us to a Met office Level 3 heatwave event we will take guidance from the The Department of Health – heatwave plan. We will minimise the risk of heat exhaustion by making sure that PE lessons are conducted inside or in the shade if we decide the weather is too hot they will be taught alternative sports based team building activities. Staff will ensure that children are drinking plenty of fluids and that they are aware of 'Sun Safety'. Children will be encouraged to wear a sunhat and keep a drinks bottle available to them throughout the day.

Fire Safety

Arrangements regarding fire safety are set out in the Fire Safety Manual. The Fire Safety Co-ordinator is the competent person for fire safety on the premises and is the immediate point of contact for all fire safety related enquiries on site.

The Fire Safety Co-ordinator ensures that:

- All staff complete the mandatory *fire safety induction e-learning course* every year
- Fire safety procedures are readily available for all staff to read
- Fire exits must be unobstructed
- Fire doors must not be propped open
- Fire safety information is provided to all staff at induction and periodically thereafter
- Fire safety notices are posted in the key areas of the building close to the fire points
- Evacuation routes and assembly points are clearly identified
- Staff are aware of their own responsibilities for knowing the location of fire points and fire exits. They should also know the location of the assembly point in the event of fire
- All staff are familiar with the flammable potential of materials and substances that they use and exercise maximum care in their use, especially with those marked *flammable*
- Fire evacuation procedures, fire safety training and fire alarm testing are carried out in accordance with corporate guidance and the premises fire safety manual
- The fire risk assessment is reviewed annually by the fire safety co-ordinator and amended as new hazards or required amendments are identified

First Aid

Arrangements regarding first aid provision are set out in the First Aid Policy. The names and locations of the first aid trained staff on site are listed in the first aid policy and also clearly signposted around the school premises.

First aid is never to be administered by anyone except first aid trained staff with in-date training certification, operating within the parameters of their training.

General Equipment

All general equipment requiring statutory inspection and/or testing on site (*eg. boilers, hoists, lifting equipment, local exhaust ventilation, PE equipment, climbing apparatus*) is inspected by appropriate competent contractors as provided by the term contractor under PBRs arrangements, or as locally arranged.

Equipment is not used if found to be defective in any way. Defective equipment is reported and immediately taken out of use until repairs are carried out.

Good Housekeeping

Tidiness, cleanliness and efficiency are essential factors in the promotion of good health and safety. The following conditions are to be adhered to at all times:

- All corridors and passageways are kept free from obstruction
- Shelves in storerooms and cupboards are stacked neatly and not overloaded
- Floors are kept clean and dry, and free from slip and trip hazards
- Emergency exits and fire doors are not obstructed in any way
- Supplies are stored safely in their correct locations
- Rubbish and litter are cleaned and removed at the end of each working day
- Poor housekeeping or hygiene conditions are immediately reported

Hazardous Substances

Hazardous substances, materials, chemicals and cleaning liquids are not permitted to be used or brought into use on site unless a documented Control of Substances Hazardous to Health (COSHH) assessment has been undertaken by the trained COSHH assessor, and the product has been approved for safe use on site by the Headteacher. The premises COSHH assessor acting on behalf of the Headteacher is the Caretaker.

When using a harmful substance, whether it is a material, cleaning fluid or chemical substance, staff must ensure that adequate precautions are taken to prevent ill-health in accordance with the COSHH assessment completed for that hazardous substance. Staff must never attempt to use a harmful substance unless adequately trained to do so, and then only when using the safe working practices and protective equipment identified in the COSHH assessment.

Where practicable, hazardous substances are stored in the secure and signed storage when not in use. For this premises the secure store is the caretaker's room. The room is locked except when in use for access.

Inspections and Monitoring

Daily monitoring of the premises through working routines and staff awareness, is expected to identify general safety concerns and issues, which are immediately recorded in the premises defect book and reported to the Caretaker

Monitoring and inspections of individual rooms is vested in those members of staff most routinely using those facilities.

Routine documented inspections of the premises are carried out every half-term. The Environment and Resources Committee is responsible for ensuring that the annual H&S inspection is carried out.

Defects identified during these routine documented inspections are immediately reported to the Caretaker. Any identified high level risks or safety management concerns are actioned at the earliest opportunity.

Periodic detailed inspections of the premises' safety management system are carried out every term by Environment & Resources Committee. These documented inspections examine all areas of the safety management system and are carried out using the locally adapted CSAF-004/CSAF-011 Annual H&S Inspection Checklist.

Kitchens

The main kitchen area is only to be used by authorised staff in accordance with the identified safe working procedures. Any persons not normally authorised but wishing to enter the kitchen area must gain approval prior to entry and must strictly adhere to the kitchen safe working practices. Safe working procedures are provided by service providers

Legionella Management

Legionella management on site is controlled by the Legionella competent person who manages and undertakes all procedures regarding Legionella in accordance with Children's Services Control of Legionella in Water Systems Guidance. Records of all related training, flushing, temperature monitoring, cleaning and defects are retained for auditing purposes.

Moving and Handling

All staff must complete the *moving and handling e-learning course* every year without exception. Staff are not permitted to regularly handle or move unreasonably heavy or awkward items, equipment or children unless they have attended specific moving and handling training and/or have been provided with mechanical aids in order to work safely.

Any significant moving and handling tasks are specifically risk assessed in order that training requirements and mechanical aids can be accurately determined to ensure that the task is carried out safely. The Caretaker is expected to undertake regular physical work which would typically include significant moving and handling, therefore he/she must attend a formal moving and handling course specific to the work requirements.

Off-site Activities

Arrangements regarding off-site activities are managed in accordance with the Outdoor Education Service's procedures and guidance.

Physical Intervention

Arrangements regarding physical intervention are set out in the Behaviour Policy.

Provision of Information

The Headteacher ensures that information systems are established so that staff are periodically provided with information regarding safety arrangements on the premises. These systems are staff meetings, meeting

minutes, email distribution. Local health and safety advice is available from Children's Services Health & Safety Team who provide both general and specialist advice.

The requirements under *Health and Safety Law* are set out in a poster displayed at the staff room

Risk Assessment

General risk assessment management is co-ordinated by the caretaker in accordance with guidance contained in the Children's Services Safety Guidance Procedure SGP 01-07.

Risk assessments must be undertaken for all areas where a significant risk is identified or a possibility of such risk exists.

The trained risk assessors on site are the Caretaker and Headteacher who oversee the correct completion of risk assessments as appropriate. Risk assessments are carried out by those staff with the appropriate knowledge and understanding in each area of work.

All risk assessments and associated control measures are to be approved by the responsible manager/headteacher or their delegated member of staff prior to implementation.

Security

Arrangements regarding security are based on the premises security risk assessment and are set out in the On-site Security Policy & procedures which include emergency unlock routines.

Stress & Wellbeing

The School is committed to promoting high levels of health and wellbeing and recognises the importance of identifying & reducing workplace stressors.

Stress management through risk assessment and appropriate consultation with staff is periodically reviewed and acted upon in accordance with the Children's Services' and Health & Safety Executive's Management Standards, guidance and requirements.

On-site arrangements to monitor, consult and reduce stress situations are performance management, staff meetings and management meetings

Traffic Management

Arrangements regarding on-site traffic safety are based on the premises traffic risk assessment and are set out in the On-site Traffic Policy and procedures.

Training

Health and Safety induction training is provided and recorded for all new staff/volunteers in accordance with New Staff Health & Safety Induction Checklist.

The Headteacher is responsible for ensuring that all staff/volunteers are provided with adequate information, instruction and training regarding their safety at work. Training needs analysis is carried out from which a

comprehensive health and safety training plan is developed and maintained to ensure health and safety training is effectively managed for all staff who require it.

All staff are provided with following as a minimum training provision:

- Induction training regarding all the requirements of this Health and Safety Policy
- Appropriate local training regarding risk assessments and safe working practices
- Updated training and information following any significant health and safety change
- Specific training commensurate to their own role and activities
- Periodic refresher training that does not exceed three yearly intervals
- Appropriate annual e-learning courses to meet HCC mandatory corporate training requirements

The caretaker ~~will~~ ensures that staff training is current and inform the Headteacher of any gaps.

Violent Incidents

Violent, aggressive, threatening or intimidating behaviour towards staff, volunteers, pupils, visitors, etc whether verbal, written, electronic or physical, is be tolerated by the School.

Staff must report all such violent and aggressive incidents to ensure that there is an awareness of potential issues and/or injurie, and so as to enable incidents to be appropriately investigated and reasonable actions taken to support those involved and reduce the risk of similar incidents occurring in the future.

Violent incident reporting is completely confidential. Violent and aggressive incidents are reported using Accident and Incident Report Form in accordance with Children's Services Incident Reporting Guidance

Visitors

All visitors must initially report to the main reception where they are provided with the key health, safety and fire safety information to enable them to act appropriately and safely in the event of an incident.

Visitors to the premises are provided with a badge once they have read the H&S information and signed in

Work at Height

Work at height is always undertaken in accordance with the Children's Services Safety Guidance Procedure SGP 23-08. Within the premises general work at height undertaken in accordance with the on-site generic risk assessment for work at height, which identifies general requirements and safe working practices. Specific or higher risk tasks are carried out in accordance with a specific risk assessment for that task.

The competent person for work at height on the premises who has attended the Caretaker Support Service Ladder & Stepladder Safety half-day course is the Caretaker and he/she is authorised to:

- Use stepladders and leaning ladders in accordance with their training

- Provide step stool instructional training briefs to staff in accordance with SGP 23-08
- Provide stepladder training to staff using the Children's Services *Stepladder & Steps Safety* user training presentation
- Carry out termly inspections of all on-site ladders, stepladders and podium steps
- Remove access equipment from use if defective or considered inappropriate for use

The competent person for work at height and all other staff are not permitted to use any other access equipment for work at height without specific training. This includes the use of scaffolding, mobile towers and mobile elevated work platforms.

Work at height on the premises is only permitted to take place under the following conditions:

- Any work to be carried out at height must be underpinned by a risk assessment
- Access equipment selected for work at height must be as per the risk assessment
- Any staff working at height must be appropriately trained to use the access equipment
- Staff are not to improvise or use alternative access methods of their own choice
- Use of any furniture, including tables and chairs, is forbidden for any work at height
- Staff may only use step stools if they have received a local instructional training brief
- Staff may only use stepladders if they have received training from the ladder and stepladder competent person
- Staff may only use leaning ladders if they have personally attended the Caretaker Support Service Ladder & Stepladder Safety half-day course within every three years
- Any safety concerns about a work at height task must be raised prior to work starting
- Access equipment used on site such as ladders and stepladders must only be that provided and are never to be lent to or borrowed from third parties or contractors
- Contractors working at height are to be appropriately supervised and must only use their own access equipment

APPENDICES

The following are a list of specific policies relating to Health & Safety:

- A. Administration of Medicines Policy
- B. Child Protection Policy
- C. Emergency Evacuation Plan
- D. Fire Safety Manual
- E. First Aid Policy
- F. On-Site Security Policy & Procedures
- G. On-Site Traffic Policy & Procedures