

# Health and Safety Introduction, Statement of Intent and Organisation



St Andrew's Prep  
EASTBOURNE

## Executive Summary

Eastbourne College Inc acknowledges its statutory responsibilities and obligations regarding health, safety and welfare and is fully committed to achieving the highest possible standards.

The charity will ensure that all premises are safe and that employees, pupils, visitors, contractors and any other persons and users of school facilities are not exposed to risks arising from our activities.

The charity will do everything reasonably practicable to provide a safe and comfortable workplace and will ensure that health and welfare requirements are fully considered.

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## 1. Introduction by the Headmaster

1.1. The health and safety policies are approved by the board of governors and authorised for use throughout Eastbourne College Incorporated. Health and safety management is based on the requirements laid down in the *Health and Safety at Work Act 1974* (HASAW) and other acts of Parliament and secondary legislation (statutory instruments or regulations) that are enforced by the health and safety executive (HSE). The company also follows Department for Education (DfE) guidance for schools' document: '*Health and safety: responsibilities and duties for schools*'.

1.2. Prime responsibility for maintaining and updating the policies rest with the Health and Safety Officer. However, all employees at both schools (i.e. Eastbourne College and St Andrew's Prep) have a degree of responsibility for health and safety, including the requirement to contribute to the accuracy, effectiveness and utility of policy and management of risk. Any proposals for amendment to, or expansion of the manual would be welcome; these should be submitted direct to the Health and Safety Officer in writing, for editing and formal promulgation to all holders. Unauthorised changes to policy documents are not permitted.

Tom Lawson  
Headmaster  
January 2024

## 2. Statement of Intent

2.1. The governors of Eastbourne College (Inc) recognise that under the *Health and Safety at Work Act 1974* and subsequent regulations that have come into force that they have a legal duty to ensure, so far as is reasonably practicable, the health, safety and welfare of all their employees and that they have certain duties towards pupils, visitors and contractors and people who use the premises of Eastbourne College or St Andrew's Prep (known as the Charity) from time to time.

2.2. The governors accept these duties and it will continue to be their policy to promote standards of health, safety and welfare that comply fully with the terms and requirements of the above act, regulations made under that act and approved codes of practice. It is considered by the governors that health and safety is a responsibility at least equal in importance to that of any other function at both schools. A member of the governing body shall be appointed to act as a focal point for Health and Safety matters at each school and will report on them from time to time to the board.

2.3. The governors and Charity recognise the Education (Independent School Standards) (England) Regulations, 2014 and the guidance issued in 2019. Additional DfE guidance is contained in *Health and safety: responsibilities and duties for schools (updated April 2022)* and the latest version of the *ISI Inspection Framework*.

2.4. The charity will provide and maintain written assessments of the risks to health and safety of its employees at both schools whilst they are at work and others who may be affected, as required by the Management of Health and Safety at Work Regulations 1999.

2.5. The governors and Charity recognise the good practice contained in the HSE guidance booklet "School trips and outdoor learning activities: tackling health and safety myths" and intends to follow the recommendations it makes.

2.6. The governors will take all such steps as are reasonably practicable to::

- a. Provide and maintain safe and healthy working places and systems of work and to protect all employees, pupils and others including the public insofar as they come into contact with foreseeable work hazards;
- b. Provide and maintain a safe and healthy teaching environment for all employees and pupils, with adequate facilities and arrangements for their welfare, including arrangements for the use, handling, storage and transport of goods, articles and substances;
- c. Provide all employees and pupils with the information, instruction, training and supervision that they require to work safely and efficiently. The Charity's Health and Safety consultants and Fire Safety consultants are available to provide relevant information and this will be disseminated to the staff as appropriate;
- d. Develop safety awareness amongst all employees and pupils and, as a result of this, create individual responsibility for health and safety at all levels;
- e. Provide a safe environment for all visitors to the Charity's premises, bearing in mind that these visitors may not necessarily be attuned to certain aspects of either school's environment.
- f. Control effectively the activity of all outside contractors when on Charity premises. It is the intention of the governors that, apart from routine supervision and control of contractors, this aim will be achieved in part by demanding copies of the contractors' safety policies at the tender stage;
- g. Encourage full and effective two-way consultation on health and safety matters by utilising the management structure at both schools and the committees already existing;
- h. Ensure that this policy is used as a practical working document and that its contents are publicised fully.

2.7. Constantly review the details of the policy and keep it in line with changes in current legislation.

2.8. Reference is made here to the requirements under the Health and Safety at Work Act 1974, Management of Health and Safety at Work Regulations 1999, the DfE's Boarding Schools National Minimum Standards, and fire safety provisions under the Regulatory Reform (Fire Safety) Order 2005 and Fire Safety Act 2021.

2.9. The Charity will ensure via the Health and Safety Officer that staff and pupils are aware of health and safety policies and practices.

2.10. To these ends, the governors have appointed Owen David Risk Management Limited to provide necessary legal, technical and practical fire, health and safety information and advice, and to provide an independent monitoring of fire, health and safety activities and operation of both schools.

2.11. Information on this statement will be issued to all employees on their taking up employment with the Charity. The statement, which may be reviewed or modified from time to time, should be read in conjunction with appropriate instructions on *Eastbourne College (Inc) Health and Safety Manual* and other safety management information, which is available for all to read on the staff intranet of both schools.



Abbey Gough  
Chief Operating Officer and Clerk to the Governors  
On behalf of the Eastbourne College (Incorporated) Governors

### 3. Health and Safety Organisation

<b>Board of governors</b> (Leadership and corporate responsibility on health and safety matters throughout the Charity)
<b>Headmaster</b> (Overall responsibility for all aspects of health and safety at both schools)
<b>Headmaster of St Andrew's Prep</b> (Delegated authority for all aspects of health and safety at St Andrew's Prep)
<b>Chief Operating Officer</b> (Overall responsibility for the domestic and administrative aspects of health and safety, and Chair of the Health and Safety Committee)
<b>Second Master (EC) and Deputy Head (SAP)</b> (Act as Vice-Chair of health and safety committee in the absence of the COO, day to day oversight of security, fire and health and safety at each school)
<b>Head of Facilities Management</b> (Act as Health and Safety Officer. Line manage the fire officer; oversee policy, strategy and operation; implementation of health and safety policy and practice)
<b>Soft Services Manager</b> (Act as Fire Officer at both schools)
<b>Housemasters/housemistresses/heads of department</b> (Ensure that necessary health and safety measures are applied in houses and departments)
<b>Teaching staff</b> (Ensure that health and safety measures are followed by staff and pupils under their control)
<b>All employees</b> (Personal responsibility for their own well-being and for health and safety of others who may be affected directly, or indirectly, by their behaviour at work)
<b>Occupational health service provider</b> (Specialist advisor on health matters including occupational health)
<b>Pupils</b> (Be as responsible within their level of maturity, comprehension and capabilities for health and safety of themselves and those around them)

### 3. Management structure and terms of reference

## Governors

The governors accept full responsibility for health and safety within the Charity. They will constantly monitor the effectiveness of the implementation of this policy and will revise it where necessary. The governors will ensure that any changes in this policy will be drawn to the attention of all employees. A nominated governor will act as the focal point for health and safety matters at each school, attend H&S Committee meetings, and will report on them from time to time to the board.

## Headmaster

The Headmaster is responsible to the governors for the safe functioning of all activities at both schools. The Headmaster is required to:

1. Monitor the effectiveness of the policy as regards both academic and non-academic work and report back to the governors as appropriate
2. Delegate authority and powers to the Headmaster of St Andrew's Prep for the effective delivery of health and safety at St Andrew's Prep
3. Delegate day to day domestic and administrative health and safety responsibilities to the Chief Operating Officer
4. Appoint the Second Master and Deputy Head as chair of each school's health and safety committee
5. Consult with the Health and Safety Officer and Fire Officer
6. Recommend changes in the safety policy in the light of experience
7. Ensure the cooperation of all staff at all levels as regards working this policy
8. Ensure that all heads and leads of department, hsms, and support managers fully understand their responsibilities and are given both the time and the encouragement to pursue them
9. Ensure that any changes in curriculum and also changes in systems of work on the domestic side are considered for their health and safety implications.

## Chief Operating Officer (COO)

On a day-to-day basis, the headmasters' responsibilities at both schools as regards the domestic and administrative responsibilities will be devolved to the COO. The COO is required to:

1. Act as chair of the Eastbourne College (Inc) Health and Safety Committee
2. Ensure the health and safety governor is notified of any health and safety issues as they arise which are either RIDDOR reportable, complex or prolonged; have the potential to make the press, or to lead to a significant insurance claim
3. Monitor the effectiveness of the policy and report back to each headmaster as appropriate
4. Appoint a Health and Safety Officer as the nominated health and safety person, responsible for obtaining, interpreting and disseminating all relevant health and safety information via the normal line management structures
5. Be the liaison point with the Charity's health and safety consultants and ensure that their services are used fully to obtain all relevant health and safety information
6. In a line management function, be responsible for the safe operation for all administrative, maintenance, janitorial and domestic staff
7. Be responsible for ensuring that all maintenance contracts involving outside bodies which monitor certain aspects of the Charity's functions are fully used and kept up to date
8. Where individual employees in the various domestic functions listed above are given posts of intermediate responsibility, identify those posts in this policy and ensure that those individuals are given the necessary instruction, responsibility and encouragement to carry out the functions that they have been given
9. Establish a system for the reporting back of all accidents, incidents, near misses and damage to Charity property and investigate accordingly. Ensure that, as defined in RIDDOR procedures, all relevant accidents are notified to the HSE by the H&S Officer. The results of these investigations, as well as being dealt with by line management function, will then be discussed by the appropriate health and safety committee at their next meeting
10. Ensure that the ordering of all harmful substances and liquids is carried out according to COSHH regulations and charity policy
11. Ensure liaising with outside bodies, who may from time to time use the facilities of the Charity and ensure that appropriate action is taken both to ensure these bodies have sufficient knowledge of the Charity and that the Charity itself is appropriately indemnified
12. Ensure the selection of outside maintenance contractors and the monitoring of all activities on the premises comply with statutory regulations, industry best practice and the charity's contractors code.
13. Delegate listed responsibilities to the Head of FM and his/her team, as deemed appropriate.

## Second Master (at Eastbourne College) and Deputy Head (at St Andrew's Prep)

The Second Master (at Eastbourne College) and Deputy Head (at St Andrew's Prep) are responsible to the Headmaster for the safe functioning of all school activities. They are required to:

1. Act as vice-chair of the Health and Safety Committee in the absence of the COO
2. Act as an additional focal point for staff communication and have oversight on matters concerning Health and Safety, Fire and Security.

## Head of Facilities Management

The Head of FM is responsible for the implementation of health and safety strategy, policy and practice. S/he fulfils the role of the Health and Safety Officer and is required to:

1. Advise on the practical application of the *Health and Safety at Work Act* and other safety legislation
2. Interpret the policies of the board of governors to hsms, heads of departments and other staff and ensure that these policies are understood and implemented effectively
3. With the Fire Officer, edit, review and update health and safety policies and other documents pertaining to fire, health and safety
4. Line manage and oversee the work of the Fire Officer
5. Act as adviser to the chairs of both school's Health and Safety Committees
6. Liaise with each chair's PA to organise meetings of each school's Health and Safety Committee
7. Make periodic inspections of domestic, sporting, classroom, laboratory and workshop accommodation and operating methods therein to ensure the provision of a safe working environment and to advise teaching staffs and heads of department of weaknesses in safety arrangements
8. Liaise with the Charity's medical officer, senior sister and Head of HR as necessary on occupational health matters and with external agencies as necessary on provision of monitoring equipment or attendance of health and safety specialists
9. Investigate accidents or dangerous occurrences, independently or jointly with hsms and heads of department, as directed by the Headmaster, COO or in accordance with the Accident Policy.
10. Submit RIDDOR report accidents to the HSE, when required.
11. Liaise with insurers, when required.
12. Ensure that safety audits are conducted at appropriate intervals and to the prescribed format
13. Receive and disseminate safety information, literature and publicity material and take all other steps necessary to actively promote interest in health and safety matters throughout the charity
14. Participate in the annual update of policies; oversee and support the update of risk assessments pertaining to health and safety

## Soft Services Manager

The Soft Services Manager, acting in his/her capacity as Fire Safety Officer (FSO), is responsible to the Head of FM for the implementation of fire safety policy at both schools. S/he is required to:

1. Ensure that all fire safety regulations, procedures and publications are kept up-to-date and held for reference in the Bursary and on the staff portal
2. Ensure all fire risk assessments are carried out in a timely fashion
3. Carry out regular checks of all fire-fighting equipment held in all Charity premises in accordance with current fire regulations and fire safety advisor's guidelines
4. Ensure that fire practices and alarm tests are carried out regularly in school, administrative and support buildings and day and boarding houses in accordance with fire safety regulations. S/he is to maintain a register recording these practices and alarm tests, which must be available for inspection on demand
5. Provide advice on fire safety matters to all teaching and support staff, with special attention being given to hsms and heads of departments requirements
6. Procure all fire safety and fighting equipment required and to prepare the input for these items for the annual budget
7. Arrange fire safety training for all members of staff in accordance with HSE guidelines for schools
8. Appoint and liaise with external fire safety consultants, as and when required
9. As a member of the health and safety committee, provide health and safety advice on all building and maintenance matters.
10. Ensure the correct control of COSHH substances and the maintenance of product data sheets where relevant in his/her area of responsibility.



## Hard Services Manager (at Eastbourne College) and Estates Manager (at St Andrew's Prep)

Both staff members are responsible to the Head of FM for the following:

1. The monitoring, assessment and management of safe working by in-house maintenance staff and all outside maintenance contractors' activities on Charity premises and ensuring that the correct health and safety procedures are followed both on major work sites in accordance with latest Construction (Design and Management) Regulations 2015 and industry best practice and during normal, day to day maintenance activities and tasks
2. Ensure contractors follow the Charity's Contractors Code of Conduct
3. The correct control of COSHH substances and the maintenance of product data sheets, and issuing of correct permits to work, where relevant
4. Ensure that the highest priority is accorded to health and safety at work
5. As a member of the health and safety committee, provide health and safety advice on all building and maintenance matters.

## Heads of department

The heads of department will be responsible to the headmaster at their respective school for the following:

1. Ensuring that his/her department is run according to the standards laid out in this policy, minimum legal standards and other appropriate standards that may be set by the Charity or by specialist regulations such as for technical and scientific environments
2. Ensuring that the teachers working under them understand the practical aspects of this policy and the various legal requirements that apply within their area of responsibility
3. Ensuring that these teachers are aware of the degree of priority that these matters carry and that where appropriate they would be provided with both the time and encouragement to pursue such matters
4. Notifying the headmaster of any matters within this field which they believe are beyond their competence to deal with
5. Reporting to the Head of FM any accidents, incidents, near misses or damage for appropriate investigation
6. Ensuring adequate supervision for pupils both inside the premises, during normal teaching activities and also on external trips as detailed in each school's Educational Visits Policy
7. As regards the COSHH regulation, for notifying the bursary management of any new substance that are required to be purchased by their department
8. Ensuring that the teaching staff, for whom they are responsible, cooperate fully with any fire practices and other emergencies as specified in part of this policy
9. For the implementation of safe working practices, the provision and use of safety equipment and the reporting of any deficiencies in buildings, plant or other equipment which are a hazard to health and safety
10. Training or briefing staff and pupils on the safety precautions to be observed in their respective departments.
11. Ensuring risk assessments and any relevant safe systems of working pertaining to their specific area of work are reviewed and updated in a time manner as and when requested by the Health and Safety Officer.
12. Ensuring that risk assessments of tasks and where appropriate, work locations, and information on possible hazards, and the safety precautions to be observed are readily available – with warning notices displayed as necessary.

## Boarding and day housemasters/mistresses

Apart from the normal supervisory role, housemasters/mistresses have very specific duties, as follows:

1. Ensuring that the boarding house structure enables all fire doors to be closed at night; if this task is delegated to a house tutor or a house prefect, the house structure should ensure that a physical or oral check is made that the task has been done
2. Making arrangements for night time fire practices at the agreed frequency for boarding houses and day time fire practices for day houses, as directed by the Fire Officer
3. Ensure that all pupils and sleeping in domestic staff in houses are fully familiar with all fire instructions and day domestic staff be included in fire evacuation notices
4. Constantly monitor all the dormitories/day prep rooms as to correct use of electrical equipment and support and allow access for PAT testing, in liaison with appropriate maintenance management
5. Ensure that all means of escape in case of fire are at all times kept free and unobstructed
6. Contact the Fire Officer if there are any problems with the location and allocation of fire extinguishers
7. Ensure that information on possible hazards and the safety precautions to be observed are readily available with warning notices displayed as necessary
8. Ensure that premises and equipment under their control are kept under regular review and inspection to eliminate unsafe conditions.
9. Reporting to the Head of FM any accidents, incidents, near misses or damage for appropriate investigation
10. Boarding Hsms line manage a matron and a resident tutor and should promote a culture of positive health and safety in their respective houses. Matrons and resident staff have a duty to support Hsms in the delivery of fire, health and safety in their house and should fully understand their house's fire and general risk assessments and procedures for evacuation as well as broader H&S matters such as first aid provision and reporting procedure, security and access, etc.

## Teaching staff

Teaching staff are to see that the necessary health and safety measures are applied. In this respect they are to:

1. Instruct pupils as necessary in the avoidance of hazards and the safe performance of their work
2. Ensure that where appropriate health and safety regulations, risk assessment and method statements are observed, e.g. use of guards and other safety equipment, wearing of protective clothing, handling of dangerous substances and avoidance of unsafe practices generally
3. Recommend improvement or changes required to eliminate hazards and remove the cause of accidents and potential accidents
4. Continually stimulate interest and awareness in health and safety by discussion with pupils.

## Laboratory assistants

They will be responsible to the head of department as appropriate for the following:

1. Isolating gas supplies to laboratories at the end of each teaching day
2. The constant security of all toxic and highly flammable substances which may be used in their department
3. To this end ensuring that all stores are kept securely locked when not actually being supervised
4. Be responsible for ensuring that all experiments and services are rendered safe, so far as it is safe to do so
5. Be responsible for ensuring that a sufficient number of the correct fire extinguishers are available within, or close to the prep rooms.

## Functional managers

This section refers to the managers who head maintenance, ground staff, gardeners, janitorial services, transport caterers (currently outsourced):

1. These managers will be responsible for the safe running of their activities. They will be responsible for ensuring adequate supervision of all activities so that the work proceeds according to standards laid down in this policy
2. They will be responsible for promoting a positive approach and culture to health and safety at work in their respective departments
3. They will ensure that staff have appropriate training according to the needs of their work
4. They are responsible for ensuring risk assessments and other safety documentation are in place that cover tasks and locations deemed appropriate for assessment of significant hazard and requiring risk mitigation. They should update their risk assessments and safety documentation in a timely manner.
5. They will undertake the necessary training pursuant upon completion of work under the COSHH regulations
6. They will be responsible for ensuring that all agreed systems of work are followed
7. Where they come across matters that they feel are not within their competence to deal with, they should refer the matter to the health and safety officer or their line manager
8. They should be responsible for investigating any accident or incident alongside the H&S Officer and in whilst following the Accident Investigation Policy.

## All members of staff

Although individual employees have a duty to look after their own well-being, they are equally responsible for the health and safety of others who may be affected, directly or indirectly by their behaviour at work. All employees have the following specific duties:

1. To carry out their work safely in the interest of other employees, the pupils and themselves.
2. To obey health and safety procedures and work systems, especially those concerning the use of machinery, guards, protective clothing, handling potentially dangerous substances and work on electrical apparatus and equipment
3. To report unsafe conditions to heads of departments, HSMs, maintenance helpdesk, appropriate support staff manager or the Head of FM (or H&S Officer, same person) so that remedial action can be taken
4. To assist directly or indirectly in the work of the health and safety committee.

### Charity Medical Officer or Occupational health service provider

The Charity medical officer and occupational service provider will, when requested by the Headmaster, the Head of HR or the Health and Safety Officer, act in an advisory capacity on the following occupational health matters:

1. Policies, procedures and facilities required to maintain a healthy working environment
2. Design of plant, equipment and work systems generally with a view to minimising health risks
3. Use of potentially harmful substances and methods of minimising health hazards.
4. Support and advise during health related events, such as epidemics, viral spread.

### Medical centres at each school

Each school has its own medical centre and senior sister and SRNs. They are responsible to the COO for:

1. Providing first aid guidance, and where appropriate, training (by the Charity's First Aid Trainer) to all members of staff
2. Ensuring that all first aid boxes are appropriate for the use of the location (department house or sport venue) and that they are in-date, fully equipped and properly signed off
3. Carrying out an annual check on all first aid boxes
4. Contribute to the review and update of the first aid policy
5. Ensuring that the medical centre is staffed, trained and prepared to meet all first aid contingencies throughout on a 24-hour basis.

### Premises Officer

1. Acts as the principal first aid contact and trainer for ECI. He is responsible for the delivery of FAW, EFAW and paediatric first aid training to all staff.

## 4. Health and safety at Work Committee (of each school)

### 1. Aims

To maintain a dialogue on health and safety matters and to provide an opportunity for staff at all levels to participate in the process of framing and implementing safety policy.

The Health and Safety Committee will comprise of members of staff from both schools. The Committee must meet on a termly basis.

### 2. Terms of reference

The Health and Safety Committee is concerned with the following activities:

1. Co-ordination of all safety matters including the examination and analysis of safety records and review of accidents
2. The study of accident statistics and trends (including near misses) with a view to improving working practices, together with recommendations for corrective action
3. Consideration of reports provided by inspectors of enforcing agencies and external advisors
4. Fostering an interest and culture in safety matters, accident prevention and occupational health amongst all staff at their respective school
5. Framing of instructions covering safe working procedures and safety rules
6. Establishing safe environmental conditions such as lighting, ventilation, access, fire prevention, hygiene and tidiness
7. Consideration of safety suggestions made by employees
8. Publicity and safety education and training arrangements, teaching aids, posters, films, booklets and other media
9. Promoting use of protective clothing and equipment, machinery guarding
10. Development of robust management systems for health and safety and safe systems of work
11. Consideration and review at regular intervals of the school's general health and safety policy statement of organisation and arrangements
12. Ensuring adequate arrangements are in place for conducting risk assessments including their implementation review and evaluation
13. Consideration of the adequacy of health and safety communication and publicity within the school and in promoting an active health and safety culture
14. Ensuring that initiatives to reduce accidents and improve the awareness of staff on related issues are effectively implemented and monitored.

The Committee's activities do not supplant or bypass normal management channels; safety is part of everyone's job and the reporting of hazardous conditions or practices is to be dealt with on the spot, through normal management channels, and not held back for health and safety committee meetings.

### 3. Composition

The College health and safety committee will consist of the following members:

#### Staff who work across both schools

- Chief Operating Officer (Chair)
- Head of FM (H&S Officer)
- Soft Services Manager (Fire Safety Officer)
- Lead Nurse
- Senior Maintenance Officer
- Health & Safety Governor

#### Eastbourne College

- Second Master
- Deputy Head, Co-curricular (as EVC)
- Director of Sport
- 1 x Housemaster
- 1 x boarding house matron
- Head of art department
- Head of science department
- Head of design technology department
- Head groundsman
- Premises Officer (principal first aider and cross charity EFAW trainer)
- Fleet Manager

#### St Andrew's Prep

- Deputy Head – Chair
- Head of Pastoral Care (as EVC)
- Housemaster
- Boarding Matron
- Director of Sport
- Head of art

- Head of science
- Head of design technology


Catering services are provided by a contract caterer. Health and safety at Work matters fall under the remit of the catering company. The general manager and chef manager at each school receives copies of the minutes of the respective health and safety committee meetings.

Any member of the teaching or support staff may be co-opted to serve on a committee as deemed necessary at the time. Any member of the teaching or support staff may attend to observe the proceedings and may contribute if invited to do so.

## 5. Health and safety documents held on SharePoint

Health and Safety documentation is stored electronically on Sharepoint, the charity's portal site. All staff have access to the portal, which contains the following documents:

- Health and Safety Introduction, Statement of Intent, Organisation
- Accident and Investigation Policy and Guidance
- Asbestos: Policy and Guidance
- CCTV Policy
- Code of Practice for Contractors
- Control of Legionella
- Control of Substances Hazardous to Health (COSHH)
- Disability Policy
- Driving at Work
- Fire Evacuation Policy
- First Aid Policy
- Health and Safety Manual
- Minibus Driving Policy
- No Smoking Policy
- Personal Emergency Evacuation Plan (PEEP)
- Risk Assessment Policy
- Risk Assessment of School Buildings and Grounds
- Security and Workplace Safety Policy
- Critical Incident Plan
- Minutes of each school's Health and safety committee
- Risk assessment library
- Access to Cleapps
- Educational Visits: Conduct and Guide is stored on SharePoint, under its own subsection within 'Useful Documents.'

Policy Owner(s)	Policy Release	Policy Distribution
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