



Health and Safety Policy

September 2025

Signed (Chair of Trustees):	
Date:	September 2025
Date of Review:	September 2026

Arbor Academy Trust reviews this policy annually. The Trustees may, however, review the policy earlier than this, if the Government introduces new regulations, or if the Trust receives recommendations on how the policy might be improved. This document is also available in other formats e.g. e-mail and enlarged print version, on request to the School Offices and is displayed on the schools' websites.

1. INTRODUCTION

- 1.1. Arbor Academy Trust has a duty under the Health and Safety at Work etc Act 1974 to provide safe and healthy working conditions for employees and to ensure that their work does not adversely affect the health and safety of other people (e.g. pupils/visitors/contractors).
- 1.2. The objectives of this statement are to ensure the following, as far as is reasonably practicable:
- 1.3.
 - a) Equipment and systems of work are safe and without risks to health;
 - b) Safe arrangements for the use, handling, storage and transport of articles and substances;
 - c) Sufficient information, instruction, training and supervision to enable all employees to identify hazards, reduce risks and contribute positively to their own and to others safety and health;
 - d) A safe and healthy place of work, including safe access to and safe egress from it.
 - e) A healthy working environment in line with current legislation identifying, eliminating and controlling risks.
 - f) Adequate welfare facilities.
 - g) Risk assessments, the principles of prevention, emergency procedures and health surveillance are applied.
 - h) Employees are competent to do the tasks required of them and have received adequate training.
 - i) Competent health and safety advisors will be referred to when necessary.
 - j) Resources will be supplied to achieve the objectives.
 - k) Staff will be consulted about a range of health and safety issues including stress (see Stress management policy)
 - l) Specific immediate and long term health and safety performance targets are met.
 - m) This policy will be reviewed and, if required, revised regularly.
- 1.4 This policy has been formulated with reference to the need for employer/employee consultation on health and safety matters and the need to consult individuals before the allocation of particular health and safety functions.

1.1. Further advice for determining the risks to health and safety within the establishment and the precautions required to deal with them is available from the Health and Safety Executive-
<http://www.hse.gov.uk/contact/contact.htm>

1.2. This policy refers to and uses the LCoPs from the London Borough of Waltham Forest.

2. THE ORGANISATION FOR IMPLEMENTING THIS POLICY INCLUDING ALLOCATION OF FUNCTIONS

1.1. THE TRUST

The ultimate responsibility for health and safety in each establishment rests with the employer Arbor Academy Trust in reference to the LCoPs 'Managing health and safety'.

1.2. THE LOCAL GOVERNING BOARD-

Chair: Lena Fox

The Local Governing Board will work together with the Head of School/ Headteacher, and the Trust to establish and meet health and safety objectives. Specifically, the Local Governing Board will:

- Act in accordance with the policy and guidelines issued by the Health and safety Executive;
- Ensure that adequate policies and procedures are in place; and
- Monitor the implementation of policies and procedures.

An annual report be submitted to the Local Governing Board by the Executive Principal regarding the school's health and safety performance.

1.3. THE EXECUTIVE HEADTEACHER/ PRINCIPAL – Maureen Okoye/ Jason Cook

Main functions are:

- (a) To ensure day-to-day management of all health and safety matters in the school in accordance with the health and safety policy, LCoP's etc;
- (b) To ensure that termly inspections and risk assessments are carried out (Refer to LCoP's 12, 15 and 21);
 - (c) To submit inspection reports to Governors and the Trust's Health and Safety Team;
 - (d) To ensure appropriate action is taken;
 - (e) To pass on information received on health and safety matters to appropriate people;
 - (f) To carry out investigations where necessary;
 - (g) To chair health and safety forums (e.g. staff or local governing board meetings);
 - (h) To identify staff training needs;
 - (i) To liaise with governors and/or the London Borough of Waltham Forest and/or the Health and Safety Executive on policy issues and any problems in implementing the health and safety policy;
- (j) To co-operate with and provide necessary facilities for trades union safety representatives to carry out their function.

1.4. HEAD OF SCHOOL/ HEADTEACHER / HEALTH AND SAFETY LEAD- Richard Barker

Main functions are as follows:

- (a) Day-to-day management of health and safety in accordance with the health and safety policy and LCoP's, etc;
- (b) Drawing up and reviewing departmental/faculty procedures from the relevant LCoP's;
- (c) Carrying out termly inspections and making reports to the Executive Principal;
- (d) Ensuring appropriate action is taken;
- (e) Arranging for staff training and information;
- (f) Passing on health and safety information received to appropriate people;
- (g) Acting on reports from above or below in the hierarchy.
- (h) Investigating and reporting accidents including RIDDOR reporting.
- (i) Carrying out and reviewing risk assessments.

1.5. SITE STAFF – Lee Smith

Main functions are:

- (a) Day-to-day management of health and safety in accordance with the health and safety policy;
- (b) Checking classrooms/work areas are safe;
- (c) Checking equipment is safe before use;
- (d) Ensuring safety procedures are followed;
- (e) Ensuring protective clothing/equipment is used, when needed;
- (f) Participating in inspections and the health and safety meetings, if appropriate;
- (g) Bringing potential problems to the relevant manager's attention.

1.6. LEGAL DUTIES OF ALL EMPLOYEES

The Health and Safety at Work Act etc. 1974 states:

"It shall be the duty of every employee while at work:

- (a) To take reasonable care for the Health and Safety of him/herself and of any other persons who may be affected by his/her acts or omissions of work, and
- (b) As regards any duty or requirement imposed on his employer or any other person by or under any of the relevant statutory provisions, to co-operate with him/her so far as it is necessary to enable that duty or requirement to be performed or complied with"

The Act also states:

“No person shall intentionally or recklessly interfere with or misuse anything provided in the interest of health, safety or welfare in pursuance of any of the relevant statutory provisions”

In order that the laws be observed and responsibilities to pupils and other visitors to the school are carried out all employees are expected:

- (c) To know the safety measures and arrangements to be adopted in their own working areas and to ensure they are applied.
- (d) To observe standards of dress consistent with safety and/or hygiene.
- (e) To exercise good standards of housekeeping and cleanliness.
- (f) To know and apply the emergency procedures in respect of fire and first aid.
- (g) To use and not wilfully misuse, neglect or interfere with things provided for his/her own safety and/or the safety of others.
- (h) To co-operate with other employees in promoting improved safety measures in their school.
- (i) To co-operate with the union safety representative and the enforcement officer of the Health and Safety Executive.

1.7. SPECIAL OBLIGATIONS OF CLASS TEACHERS

The safety of pupils in classrooms, laboratories and workshops etc is the responsibility of class teachers who have traditionally carried responsibility for the safety of pupils when they are in their charge.

If for any reason, (e.g. the condition or location of equipment, the physical state of the room or the splitting of a class for practical work) a teacher considers he/she cannot accept this responsibility, he/she should discuss the matter with the Head of School/ Headteacher before allowing practical work to take place.

Class teachers are expected:

- (a) To exercise effective supervision of the pupils and to know the emergency procedures in respect of fire, bomb scare and first aid, and to carry them out.
- (b) To know the safety measures to be adopted in their own special teaching areas and to ensure that they are applied.
- (c) To give clear instructions and warning as often as necessary.
- (d) To follow safe working procedures personally.
- (e) To call for protective clothing/equipment, safe working procedures, etc. when necessary.
- (f) To carry out risk assessments of the environment, resources, activity before allowing a session to continue.
- (g) To make recommendations to the Head of School etc. on safety equipment and on additions or improvements to plant, tools, equipment or machinery which are dangerous or potentially so.

1.8. THE UNION SAFETY REPRESENTATIVE: Maeve McHugh

(Refer to LCoP 27 Safety Representatives and Safety Committees)

Union safety representatives have various rights given to them. For example, they have the right to time off with pay for training, and to the facilities necessary for them to carry out their role; they can also carry out workplace inspections and investigate accidents on behalf of their trades union. These inspections and investigations are quite separate from those carried out on behalf of employers; (i.e. Union Safety Reps do not inspect on behalf of the Executive Principal, Head of School/ Headteacher, site manager). Safety representatives must be consulted by employers on any measures that may substantially affect the health and safety of employees, and on a range of other issues.

1.9. PUPILS

Are expected:

- (a) To exercise personal responsibility for the safety of self and classmates.
- (b) To observe standards of dress consistent with safety and/or hygiene (this would preclude unsuitable footwear, knives and other items considered dangerous).
- (c) To observe all the safety rules of the school and in particular the instructions of teaching staff given in an emergency.
- (d) To use and not wilfully misuse, neglect or interfere with things provided for his/her safety.

1.10. VISITORS/SECURITY

(Refer to LCoP 9 Improving security in schools)

Regular visitors and other users of the premises (e.g. contractors and delivery persons from specific companies) are required to observe the safety rules of the school. In particular parents helping out in school must be made aware of the health and safety arrangements applicable to them through the teacher to whom they are assigned.

All visitors must report to the reception office where a 'signing in' system is in operation. Visitors will be asked to wear identification badges while on school premises.

1.11. STAFF HOLDING POSITIONS OF RESPONSIBILITY

THE MANAGEMENT CHAIN

Level (1) Executive Principal, Head of School/ Headteacher, Site Service Officer

Level(2) Human Resources manager

Level(3) Class Teacher, Office

DELEGATION OF FUNCTIONS

Level(1)-Day to day responsibility for all health and safety matters

- Liaise with Governors and the Trust

Level(2)-Implement phase/building procedures

- Arrange for staff to be trained/informed
- Check procedures are followed

Level(3)-Check work area/equipment is safe

- Check procedures are followed
- Report defects
- Carry out special tasks (e.g. first aid)

<u>NAME</u>	<u>POSITION</u>	<u>AREA OF RESPONSIBILITY</u>
Maureen Okoye	Executive Headteacher	Day to day responsibility for all health and safety matters.
Jason Cook	Executive Principal	Liaise with Governors and the Trust.
Richard Barker	Head of School	Day to day responsibility for all health and safety matters. Liaise with Governors and the Trust. Arrange for staff to be trained / informed. Check procedures are followed in all years. Day to day responsibility for risk assessments and checklists to be carried out.
Loren Feeley	Human Resources Manager Site Services Officer	Day to day responsibility for all health and safety matters. Ensure health and safety of the site and staff. Liaise with Governors and the Trust.
Kelly Howard	Office Manager	Day to day responsibility for all health and safety matters. Liaise with Governors and the Trust.
Maeve McHugh	Assistant Headteacher	Check procedures are followed yrs 4, 5 and 6.
Julie French	Phase Leader	Check procedures are followed yr 1, 2 and 3
Richard Barker	Phase Leader	Check procedures are followed in Foundation stage.
Gallacher H & S Services	Competent Person	

ARRANGEMENTS FOR HEALTH AND SAFETY

The school health and safety manual LCoPs' form part of the school arrangements. These are disseminated to relevant staff and implemented. References to relevant LCoPs are made in this section.

1.1. SUPERVISION OF PUPILS

Pupils are supervised by:

- Teachers, SENCO, Sports Instructor, Music Instructor, NNEB's and Teaching Assistants during curriculum time.
- Teachers, SENCO, Sports Instructor, NNEB's, Teaching Assistants during morning and afternoon playtimes.
- Midday Supervisors, Teachers, Assistant Head teachers, Sports Instructor, teachers and Head of School during lunchtime

1.2. CHILD PROTECTION

Please refer to our Child protection policy.

1.3. PROVISION OF FIRST AID

(Refer to LCoP 35 - First Aid in Educational Establishments)

Each school has designated first aiders, who work throughout the school.

Name of Member of Staff	Work base position held	When on duty
Kelly Howard	Main School Office	8:15am – 1pm and 2pm – 4:15pm
Lisa Sheridan	Two year old provision	All day

First Aid boxes are kept in:

- School office
- Nursery
- All Classes
- Playground during lunch time

The contents of first aid boxes are regularly checked and maintained first aid boxes.

1.4. ACCIDENT/INCIDENT/DISEASE REPORTING AND INVESTIGATING

(Refer LCoP 1 Accident Reporting etc.)

If anyone should become ill or suffer injury as a result of an accident the procedures below must be followed.

- (a) First Aid should be rendered, **but only as far as knowledge and skill admits**. If circumstances necessitate, the trained first aider should be summoned immediately to tend to the patient. The patient should be given all possible reassurances, and if absolutely necessary, removed from danger.
- (b) If the patient needs to be taken to hospital then an ambulance should always be called. If an ambulance is required the emergency “999” service should be used. For cases of a less severe nature then it may be appropriate to transport a member of staff/pupil to a casualty department without using the ambulance service but it should be noted that this should always be on a voluntary basis. (If a member of staff uses his/her own car for these purposes he/she must ensure that he/she has obtained specific cover from his/her insurance company). Whenever possible no casualty should be allowed to travel to hospital unaccompanied if there is any doubt about their fitness to do so.
- (c) Accident Forms

Accidents must be reported in accordance with LCoP 1 Accident Reporting and Investigation. Some accidents require reporting immediately (i.e. by telephoning the Health and Safety Unit on Tel: 020 8496 3408). Staff need to be aware of the accident reporting system.

School’s Accident/Incident Report Form (SAIR) – (Revised October 2012)

Every case of injury, accident or incidents, including cases of physical or verbal violence must be fully and accurately reported and, where possible, detailed statements should be obtained from witnesses. Accident forms are obtained from the office. An accident form must be completed where necessary. The Head of School/ Headteacher must forward without delay the accident form to the Health and Safety Unit.

1.5. FIRE AND EMERGENCY PROCEDURES

(Refer to: LCoP 33 Emergency Procedures and LCoP 34 Fire Precautions)

It is the duty of all members of staff to carry out the fire and emergency procedures as follows:

(i) Escape Routes

The Site Service Officer is responsible for ensuring that all escape routes are kept clear and reporting any building defects.

(i) Fire Fighting Equipment

All fire fighting equipment is serviced annually by Interserve

The Site Service Officer is responsible for ensuring that the annual service takes place, and that an inventory of all equipment and a plan showing its location is held by the school.

(ii) Fire Alarms

Fire alarms are tested weekly by Site Service Officer and recorded in the fire alarm logbook. Fire alarms maintenance is the responsibility of the School and the system should be inspected / tested four times a year.

Faults are reported to the NPS Management on Tel; 020 9523 6232.

(iii) Fire Drills

Termly fire drills will be arranged by the Head of School/ Headteacher. The purpose is to remove everyone from the building as quickly as possible, assemble them in a safe place and check attendance. The following staff have specific responsibilities:

Office Staff to call emergency services

Site Services Officer, Executive Principal, Head of School/ Headteacher Assistant Head teachers, Welfare Assistant and Inclusion Manager to check all buildings

Executive Principal, Head of School and Assistant Headteachers to take charge of assembly area. Ensure that classes have evacuated and in lines. Ensure that all children are counted and correct.

Fire Marshalls to ensure that their area is clear and evacuated.

Fire Marshalls: Lee Smith, Richard Barker

(v)Evacuation Procedures for Serious and Imminent Danger

It is the duty of all members of staff to carry out the procedures necessary to stop work and move to a place of safety when faced with a situation presenting serious and imminent danger.

(VI) Lock Down Procedures for Serious and Imminent Danger

It is the duty of all members of staff to carry out the procedures as described in the Lock Down Policy and to ensure all windows and doors are closed and locked where possible in the event of the lock down procedures being initiated.

1.6. HEALTH AND SAFETY GUIDANCE AND ADVICE

Staff will receive copies of relevant health and safety documentation issued by the London Borough of Waltham Forest Health and Safety Unit by means of: **direct email to the School.**

All staff must ensure that guidance is adhered to.

A central copy of the School Health and Safety Manual is available for all staff in the school office

A copy of the Health and Safety Briefing note is displayed on the health & safety notice board. Its contents are integrated into the school policy / procedures.

Comprehensive guidance on the various aspects of health and safety can be found on the Intranet site.

1.7. TRAINING

It is the responsibility of senior managers to identify the training needs within their area of responsibility and advise the Head of School/ Headteacher. All staff are encouraged to request release to attend health and safety training courses e.g. first-aid, fire safety, manual handling, use of computers, lone working/personal safety, work related stress etc.

1.8. MAINTENANCE AND REPAIRS

(Refer to LCoP 3 Building works in education establishments and LCoP 3A Employing competent contractors)

- (i) The School Condition Survey itemises works requirements, together with cost estimates. All defects must be reported as appropriate, for repairs to be carried out. All maintenance items reported to NPS Maintenance Services for their action should be recorded in the Maintenance Book, Ref. PS 6170.

Any concerns regarding outstanding Council repairs and any modifications made to the school should be reported to the School's Organisation Partnership and Development Services on Tel: 020 8496 3548.
- (ii) Lightning protection should be arranged every 12 months either via the Electrical or another Contractor. NPS Property Maintenance/School's Organisation Partnership Development Team holds the test and inspection certificates. Also, the School should hold a copy).
- (iii) Gas equipment is serviced annually by a Gas Safe Registered Engineer.

1.9. ELECTRICAL EQUIPMENT

(Refer to LCoP 7 Electricity at work).

- (i) All portable appliances will be tested annually by Office Test

A copy of the inventory of the electrical equipment tested including test results will be held in the main office. All staff must visually check all electrical appliances prior to their use and report any defects to their line manager/senior staff. All defective equipment must be taken out of use immediately. **Privately owned appliances must not be used.**

- (ii) With Fair Funding, the School should inspect fixed wiring every 5 years. This can be arranged and monitored by NPS Maintenance Services or the School's own Contractor. Certificates of inspection are held by the Electrical Section/Contractor (with a copy to the school).

1.10. MONITORING PREMISES AND FACILITIES

(Refer to LCoP 32 Work equipment)

- (i) All machinery and plant must be checked for health and safety prior to being used on site.
- (ii) Line managers/senior staff must ensure that there is a system of inspection to identify and risk assess any dangerous machinery.
- (iii) With Fair Funding, Pressurised plant is the responsibility of the School and is inspected and should be tested by NPS Property Services or the School's own Contractor.
- (iv) Lifting machines are the responsibility of the School and should be inspected and tested every 6 months.

Therefore arrangements should be made for these machines to be serviced 4 times a year.

1.11. GAS/HEATING SYSTEMS

(i) The boiler is the responsibility of the School and is maintained by NPS Maintenance Services. Boilers are serviced annually. Enquiries to: 020 8523 6232.

1.12. WATER HYGIENE INCLUDING LEGIONELLA TESTING

(Refer to LCoP20 Water Hygiene (Control of Legionella Bacteria in Water Systems))

- A competent person (NPS) carry out regular risk assessments and monitoring of water supplies and equipment.
- Immediate action is taken if a supply is found to be unwholesome or a potential danger to health.
- Monthly tests of water temperature, quarterly analysis of water sample, biannual inspection of water storage tanks, annual review of risk assessment.

1.13. CONTRACTORS ON SITE

(Refer to LCoP 3a Competent Contractors and LCoP 9 Improving Security in Schools)

The Site Service Officer will be responsible for Contractors entering or working within the School S/he will be responsible for monitoring the work.

If contractors' activities create a risk to health and safety of staff, pupils visitors etc the head of establishment should issue any instructions necessary to reduce the risk. The Project Officer should then be notified. Assistance may be sought from Health and Safety Management/School's Organisation Partnership Development Unit. On Tel: 020 8496 3548.

1.14. ASBESTOS

A copy of the asbestos survey is kept in the Head of School/ Headteacher's Office. The School may arrange for an update via NPS Maintenance Consultancy Tel: 020 8523 6232. Staff are made aware of the

presence of asbestos material to ensure that it is not interfered with in any manner, and for monitoring purposes.

The asbestos survey report is to be made available to contractors who should only begin work when it is established that asbestos material is not present.

Guidelines for action to be taken on discovery of damaged or disturbed asbestos containing materials are to be found in LCoP Building works in education establishments.

1.15. RISK ASSESSMENT

(Refer to LCoP 15 Risk assessments)

- (i) Risk assessment is a legal requirement. It is the process of identifying hazards and assessing the risks of harm and loss threatened by the hazard. The assessment considers consequences and implements control measures to reduce the level of risk of harm.
- (i) The Executive Principal/ Head of School will ensure that a risk assessment of the premises, methods of work and all school– sponsored activities are conducted on a regular basis. The assessment will identify defects and deficiencies, together with the necessary remedial action or risk control measures.
- (ii) The Health and Safety Team will produce some Generic risk assessments. Such assessments are adapted into the school working practises.
- (iii) Regular reminders on risk assessment and topics that may require risk assessing feature in issues of health and safety news.
- (iv) Reporting Of Hazards.

Any person noticing a hazard (something with a potential to cause harm or loss) should immediately take steps to protect other persons from the hazard. It should then be reported to

Site Service Officer for building defects

Office Staff for equipment

or the appropriate person, if the hazard was due to poor planning of an activity.

The union safety representative should be consulted on risk assessment.

- (v) Control Of Substances Hazardous to Health (COSHH)

All substances/equipment used within the establishment must comply with LCoP 18 COSHH. Risk Assessments for new substances must be provided. It is the responsibility of the School to inspect and test fume cupboards once every fourteen months. The School will hold a copy of the report.

1.16. EDUCATIONAL VISITS (Refer to Requirements for Educational Visits)

Each School has its own Educational Visits Co-ordinator (EVC). The school utilises the Advice and Procedures for Educational Visits produced by OUTSET. The school's own procedures are available from the EVC.

The School's Educational Visits Co-ordinator (EVC) is Richard Barker

1.17. PE EQUIPMENT AND PLAY EQUIPMENT

PE equipment and play equipment shall be inspected termly by the Assistant headteachers and regular visual inspections will be undertaken by Class Teachers

Any defective equipment must be taken out of use immediately and reported to the **Head of School/ Headteacher**.

1.18. CLEANING ARRANGEMENTS

(Refer to LCoP 14 slips/trips/falls, LCoP 7 Electricity at work, LCoP 32 work equipment, LCoP 17 Working alone and LCoP 18 Hazardous Substances)

The school is cleaned by: School cleaning staff. Problems related to cleaning are dealt with by: The Site Service Officer

1.19. SITE SECURITY

(Refer to LCoP 6 Dealing with violence and LCoP 9 Implementing Security in Schools)

All visitors must report to the main School Office where they will be photographed and asked to complete the digital sign in system. They will be provided with a visitors' badge attached to a red lanyard to wear as identification whilst on the premises.

Any member of staff who notices an unidentified person on the site should seek to identify that person and/or inform the Site Services Officer or a member of the senior management team immediately.

1.20. PROTECTIVE CLOTHING AND EQUIPMENT

(Refer to LCoP 13 Personal Protective Clothing / Equipment)

Where protective clothing and equipment is provided, both staff and pupils must use it at all relevant times. Damaged or insufficient protective clothing or equipment must be reported immediately to a senior member of staff.

1.21. EXTERNAL LETTINGS

External lettings are dealt with by the Executive Principal/Executive Headteacher

Where necessary, health and safety information will be passed on to the letting groups e.g. contact personnel, safety rules, emergency procedures, hazard-reporting etc.

1.22. WORK EXPERIENCE

Each school has a work experience co-ordinator to ensure that young people are placed in a safe and appropriate environment, work placements are vetted and monitored by the Head of School/Headteacher.

1.23. STRESS MANAGEMENT

(Refer to LCoP 26 Managing work related stress)

Managers design jobs so that the stressful elements are reduced, where possible, and seek to match staff skills to the demands of the job. Managers actively work with staff to try and reduce work load. Managers risk assess the stress involved in a range of tasks. Performance management allows development of clear targets. All staff can assist in the risk assessment process.

1.24. BULLYING AND VIOLENCE

(Refer to LCoP 6 Dealing with violence towards staff in the Education sector)

It is the responsibility of all staff to report any incidents of violence or bullying in the work place. Preventative measures are taken when meeting a parent such as meeting in a visible location with another member of staff where possible.

1.25. CONCLUSION

It is everybody's responsibility to make these arrangements work. Any member of staff noticing a failure to comply with the policy should immediately report the circumstances to their line manager. If no action is taken, then, guidance should be sought from the Health and Safety Team.

If an improvement or prohibition notice is served by an enforcing officer to the Executive Principal, they should immediately advise the Executive Director of the Children and Young People's Services and the health and Safety Team, and comply with the requirements of the notice.

This policy will be monitored by the Health and Safety Team to assess its effectiveness and to determine whether satisfactory standards of safety performance are being achieved. Monitoring can be achieved by accident/incident reporting, safety inspections, audits etc. The Health and Safety Team will undertake health and safety audits.

Suggestions by any member of staff to improve standards of health and safety are welcomed by the Executive Principal and Local Governing Board.

Communication of Health and Safety

Copies of this Health and Safety policy are displayed on notice boards in the offices and staffrooms and on the school website.

Staff receive Health and safety information on induction to the school.

Review

A review of this health and safety policy will take place annually or after a significant event.

Fire inspections, safety inspections and reviews of accident and incident reports will inform any changes made to the policy.