



ST. JOSEPH'S COLLEGE
READING • BERKSHIRE

Health and Safety Policy

Policy Owner Bursar	Associated documents	Legal Framework
Review by F&GP	Review frequency Annually	Next Reviewed date November 2026

Health and Safety Policy

Part 1 – Health and safety policy statement

St Joseph's College places the greatest importance on health and safety matters and undertakes to conduct its operations in such a way as to ensure the health and safety of all its pupils, employees, visitors and the general public.

To this end, the College will endeavour to create and develop a working environment in which there is an awareness of the vital importance of health and safety and which encourages all employees to participate in developing and practising safe working methods and to have regard for the welfare of themselves and others.

The Board of Governors of St Joseph's College accepts responsibility under the Health and Safety at Work Act 1974. The Chair of the F&GP Committee is tasked with direct oversight of health and safety.

This will include ensuring arrangements for:

- The provision of a safe and healthy place of work, including access and egress from the premises, and adequate facilities and arrangements for the welfare of employees and pupils
- Considering the safety of pupils, parents, contractors and any others who may be affected by College activities
- to prevent accidents and cases of work-related ill health and provide adequate control of health and safety risks arising from premises and College activities
- to allocate clear responsibilities for health and safety through the school management team
- to provide adequate information, instruction and training for employees including temporary employees and contractors.
- to engage and consult with employees on day-to-day health and safety conditions and provide advice and supervision on occupational health
- to implement emergency procedures – evacuation in case of fire or other significant incident
- The safe storage and handling of substances

This policy statement and the associated responsibilities and arrangements will be reviewed annually to ensure that they meet changes in legislation and best practice.

Part 2 - Responsibilities and Organisation.

This document sets out the designation of responsibility for health and safety within the College and overall management arrangements.

Board of Governors

The Board of Governors of St. Joseph's College is the employer under the terms of the Health and Safety at Work Act and has a statutory duty to ensure health and safety on the premises and for all College activities. The Chair of the F&GP Committee is tasked with direct oversight

of health and safety. In this role they will review the recommendations from the appointed Health and Safety Advisor – Assurity Consulting and the ongoing record of compliance on Assurity Plus.

The Governors will:

- Accept full responsibility for health and safety within the College.
- Provide adequate resources to ensure that the objectives of the health and safety policy are met.
- Ensure their decisions reflect the aims of the health and safety statement of intent.
- Ensure that the health and safety policy is reviewed annually.
- Provide leadership in delivery of effective health and safety management.
- Ensure that they receive suitable and accurate reports on health and safety compliance and accidents.

Head and Deputy Head (Prep)

The Head and the Deputy Head (Prep) are responsible for ensuring that the College and Prep School operate in a healthy and safe environment, and have responsibility to monitor, establish and review the overall effectiveness of the School Health and Safety policies.

They do this through the provision of adequate resources and delegation to competent personnel.

Bursar

Day to day coordination of health and safety falls to the Bursar who accepts the role of Health and Safety Officer. The Bursar has responsibility for the day-to-day maintenance and development of safe working practices and a safe working environment for staff and pupils. S/he will:

- Ensure adherence in all respects to the Health and Safety policy of the College and in particular to ensure that the necessary resources for implementation are available and that the appropriate training is given to staff.
- Plan, organise, control, monitor and review the arrangements for Health and Safety including the arrangements for any visitors (including contractors).
- Ensure that general risk assessments and specific risk assessments as required by Health and Safety legislation are carried out.
- Chair the Health & Safety Committee.
- Report on health & safety to the Governors' Finance & General Purposes Committee
- Ensure that training and instruction have been given in all procedures including emergency procedures.
- Investigate and keep a record of all cases of ill health, accidents and hazardous incidents.

Site Manager

The Site Manager supports the Bursar with day-to-day management of health and safety and in liaison with those letting College facilities.

The Site Manager is responsible for the day-to-day maintenance of the site and for identifying and rectifying issues as they occur through the monitoring of the online fault reporting system. They are also responsible for ensuring that any statutory testing or inspection is completed.

The Site Manager liaises with the appointed health and safety advisor.

The Management Team

The Management Team including Deputy Heads, Assistant Heads and Department Heads will take steps so far as is reasonably practicable to ensure that the workplace is a safe and healthy environment in which employees, pupils, contractors, and other persons affected by the College operations, can work.

College Assistant Head (Enrichment and Extension) – Educational Visits Coordinator

The Assistant Head (E&E) oversees the planning of the organisation of trips in line with the Educational Visits Policy.

Human Resources

The Human Resources Coordinator will maintain the College training matrix and ensure that training records are held and refreshers arranged as required.

Heads of Department

Every Head of Department, and every employee with a supervisory role, is responsible for ensuring as far as is reasonable and practical the safety of staff, pupils and other persons in their area of responsibility.

- Ensure that the departments and areas under their control are managed and run, in accordance with the health and safety policy and arrangements.
- Complete risk assessments for all areas and activities within their control in line with the risk assessment arrangements and save within the Risk Assessment area of the Shared Drive in the folder for the relevant academic year ensuring they are reviewed at least annually.
- Notify the Head, Head of Prep or Bursar of any health and safety concerns.
- Ensure that staff in their department understand the operational requirements of the health and safety policy.
- Keep abreast of the guidance and best practice relevant to their department so that College procedures can meet these and risk assessments reflect this.
- Ensure adequate supervision of pupils.
- Identify training needs relevant to their department.
- Enable staff to attend or complete the necessary health and safety training.
- Ensure that agreed safe systems or work are followed by staff within their control.
- Ensure the means of escape in their areas are kept clear.

Head of Physics

In addition to the departmental responsibilities above, the Head of Physics fulfils the responsibility of Radiation Protection Supervisor.

All Staff

Each individual must:

- Make sure that work is carried out in accordance with this policy, procedures, risk assessments, associated documents and best practice for their area.
- Protect his or herself and others by using any guards or safety devices provided and by wearing the personal protective equipment provided and never interfering with or disconnecting safety devices.
- Adhere to training and instructions.

- Inform their immediate line manager, head of department or supervisor of any new hazards identified.
- Offer any advice and suggestions that they think may improve health and safety.
- Report all accidents, ill health, fires, incidents or near misses.
- Report all defects or maintenance issues as soon as possible. Be familiar with the location of fire procedures, fire alarm call points, fire escape routes, assembly points and fire-fighting equipment.
- Must cooperate with management, thereby enabling managers to carry out their obligations in respect of health and safety;
- Inform the School of any medical condition which may affect their ability to carry out their work safely.
- Uphold the no smoking policy

If any individual is in doubt about any safety matter they must consult their line manager, Bursar or the Head.

Pupils

All pupils should be instructed and supervised in line with the Supervision of Pupils Policy and departmental risk assessments to ensure they do not endanger themselves through their acts and omissions. They must be encouraged to follow safety procedures at all times and notify relevant members of staff if they see any uncontrolled hazards.

Health and safety advisor

The school has appointed the support of a competent health and safety advisor, Assurity Consulting.

Assurity Consulting will:

- Complete a full School review (Safe School Assessment) at least every 3 years
- Complete a fire risk assessment at agreed frequency
- Complete a Legionella risk assessment at agreed frequency
- Provide access to their online compliance and reporting system, Assurity Plus 2.0
- Provide support as detailed within their contract including visiting the school once per half term and reporting to the F&GP Committee at least annually

Consultation and Communication of Health and Safety

The school has a Health and Safety Committee chaired by the Bursar. This meets termly and is attended by Heads of Department and staff with a specific Health and Safety responsibility. Its task is to oversee and monitor the effective implementation of the safety policy within the College and to regularly review the contents of the safety policy.

The following methods are also utilised for communication of health and safety information within the College:

- Inset days;
- Noticeboards;
- Department meetings.
- Staff Meetings
 - All Staff
 - Teaching Staff (both Senior and Prep)
 - Non-Teaching Staff

- Weekly Staff Briefing
 - Senior Staff
 - Prep Staff
- Weekly Notices
- Staff Forum (Senior and Prep)
- Weekly Facilities Meeting for key staff

Health and safety updates are provided by the Bursar to all staff in the staff meeting at the start of term.

A copy of this policy is briefed and made available to all employees when they join the College. Changes are communicated to staff and copies placed in staff room noticeboards.

Training

The College will provide employees with the following health and safety training:

- The Bursar is to ensure that induction training, to include general health and safety information, our policies and risks associated with the role is delivered. Training will also include arrangements for accident reporting, first aid and fire.
- Induction training will be provided during New Staff Induction Day or individually as required and recorded in personal files.
- Key health and safety training is detailed in the training matrix.
- Additional health and safety training as they take on new responsibilities or are exposed to or manage additional risk.
- Refresher training as required.

It is the responsibility of Heads of Department to identify through the risk assessment process and external sources what training is necessary within their departments and maintain a matrix and records accordingly.

In addition the College utilises Educare software to provide, monitor and record a range of health and safety training.

Compliance Management and record keeping

The electronic compliance system Assurity Plus 2.0 is used as a central point for health and safety compliance management. This includes regular compliance checks, audit report management and all work provided by our health and safety advisor.

Other records relating to health and safety will be saved to ensure they are easily retrievable for review and audit.

Review

A schedule of internal checks and audits will be completed to ensure that the policy is followed successfully throughout the College. This includes a College Health and Safety Inspection checklist which is completed monthly by the Site Manager.

An external review of health and safety management across the school is completed at least every 3 years in the form of a Safe School Assessment.

Reference Documentation

Specific arrangements are outlined in part 3 of this policy. Additionally, staff are required to ensure that they have read and understood the contents of:

- Pupil handbook
- Staff Handbook incorporating College Policies and Risk Assessments.
- Fire risk policy
- Fire and Emergency Routine
- Personal Emergency Egress Plans
- College Critical Incident and emergency plan
- College Business continuity plan

Part 3 - Specific arrangements

This section of the Health and Safety Policy details the specific arrangements covering areas and activities where significant risks have been identified. In broad terms, these describe the arrangements for matters outside the specific risks of an individual department. For example, this specifies details on fire prevention, the use of College minibuses, electrical safety etc. Additional information is also available in the staff handbook.

In addition - and these are just as important and relevant as the more general arrangements - the specific local arrangements and rules for individual Departments are prepared by the Head of the Department and can be obtained from that department.

ACCIDENT REPORTING, RECORDING AND INVESTIGATION

All accidents involving injury or harm, incidents of violence, dangerous occurrences and near misses to staff, pupils, visitors or contractors on school premises, trips or business activities need to be reported so that we maintain a record, investigate appropriately and identify causes so that reoccurrence can be prevented. The Reporting of Injuries, Diseases, and Dangerous Occurrences Regulations (RIDDOR) outlines the requirement for the recording of accidents, as well as the reporting of specific accidents to the Health and Safety Executive. Please refer to the Accidents Reporting Procedure Policy in the staff handbook which provides further guidance on the Schools requirements under RIDDOR and when this applies.

ASBESTOS

The Site Manager is responsible for ensuring that there is an up-to-date Asbestos Management Plan' for whole school premises and where there is known asbestos that a risk assessment is evident to manage the asbestos and that annual condition assessments are completed and recorded.

The Asbestos Management Plan is held in the Site Manager's office.

CATERING/FOOD HYGIENE

Our catering provision is outsourced to Thomas Franks. To show due diligence for food hygiene, the Site Manager obtains copies of their annual audit, policy and HACCP as part of the control of contractors arrangements.

Please also refer to the Catering and Food Hygiene Policy.

CLEANING/SLIPS AND TRIPS

The cleaning and supervision of the College premises is the responsibility of the Site Manager. The responsibility for ensuring that there are no slip or trip hazards also lies with all staff, who through their induction training are informed not to leave items where they could become trip hazards, report spillages immediately to the Site Team and ensure spillages are not left unattended until they have been cleaned.

There is a programme of formal and informal inspections of the school.

CONSTRUCTION (including project safety)

Construction or refurbishment projects are overseen the Bursar who will ensure compliance with the Construction Design and Management Regulations (CDM). In particular the requirement to ensure that responsibilities of the client under CDM are always met.

CONTRACTORS

The College is not absolved of its duty of care where contractors are appointed to perform tasks. Both parties must ensure that all appointed contractors and sub-contractors carry out their activities in a safe manner. Where possible works are carried out in the school holidays.

The Site Manager obtains information from contractors including methods, risk assessments and insurance and ensures that contractors receive relevant safety information and are supervised as necessary.

CONTROL OF SUBSTANCES HAZARDOUS TO HEALTH (COSHH)

This policy relates to all sections of St Joseph's College, including the Early Years Foundation Stage.

The Control of Substances Hazardous to Health (COSHH) Regulations 2002 require that an assessment should be made of the use at work of substances that are hazardous to health, and that steps should be taken to prevent or, where this is not reasonably practicable, adequately to control exposure to these substances. The Management of Health and Safety at Work (MHSW) Regulations 2006 extend the requirement to provide risk assessment and provide appropriate follow-up to any operation involving hazards.

All substances will be used in accordance with any manufacturer's instructions and advice on product labels, and advice given in:

- CLEAPSS LP5 'Safe Use of Household and Other Chemicals'
Laboratory Handbook and HAZCARDS
- ASE 'Safeguards in the School Laboratory'
'Topics in Safety'
- Educare COSHH Online Training

In all departments where hazards may be present, the Head of Department will be responsible for establishing and operating a system which ensures compliance with the appropriate COSHH or MHSW Regulations. Science and Technology have systems in operation, but all departments must regularly review their need to operate an appropriate system.

An appropriate system to ensure compliance with COSHH or MHSW Regulations will cover the following items: department policy document; communication; training; regular review of risk assessments and other safety documents; planning for improvements; inspection; monitoring; recording; annual report. Whilst the Head of Department is responsible for this system, functions may be delegated to other staff but delegation must be well defined.

Contractors responsible for Catering and Cleaning are required, under contract, to abide by the relevant regulations (COSHH 2002) and procedures with respect to the control and management of substances hazardous to health.

The COSHH Regulations apply to activities where hazardous substances are used and to activities which produce hazardous substances. Hazardous substances can be found in Science, Art, DT, Cleaning, Catering, Estates and Grounds.

DANGEROUS SUSTANCES (EXPLOSIVE ATMOSHERES)

Where flammable substances such as fuels and bottles gases are held, the risk will be suitably assessed either individually or as part of a wider risk assessment.

DISABILITY AND ACCESS

The College will take all reasonable measures to ensure that the premises are safe for all. Procedures will be implemented to ensure the safe evacuation of anyone whose ability may be impeded, safely and quickly through the use of personal emergency evacuation procedures.

Please refer to the College Accessibility Plan

DISPLAY SCREEN EQUIPMENT

A 'user' of display screen equipment in the school is a person who habitually uses DSE as a significant part of their day.

Incorrect use of DSE or poorly designed workstations or work environments can lead to pain in necks, shoulders, backs, arms, wrists and hands as well as fatigue and eye strain. The causes may not always be obvious

DSE users will complete a DSE risk assessment using the HSE risk assessment form, available on request from the Site Manager. Any remedial requirements are then followed up by the Site Manager.

DSE assessments are completed:

- When new 'users' join
- When 'users' move workstation or obtain new equipment
- If a 'user' notifies of musculoskeletal pain or discomfort
- If a 'user' becomes an expectant mother
- If a user returns to work after a long period of illness.

Workstation assessments will also be reviewed periodically and at least every 3 years.

Eyesight tests are provided at the expense of the school. If corrective glasses are then required for computer work these will be provided. Staff should contact the Bursary for details. The school will meet the cost of an eye test at an NHS registered Optometrist, together with the cost of a basic pair of spectacles to the total value of £100.

The school will ensure that workstation equipment is provided in accordance with the 'schedule of equipment' as indicated in the Display Screen Equipment Regulations. There are tips for ensuring a comfortable working environment in the staff handbook.

Guidance is provided on posture, simple exercises to help circulation and to combat fatigue and on the need to take regular, short breaks from the screen.

Pupils

Although pupils do not spend most of the school day working with VDUs, they spend increasing amounts of their private study and leisure time with screens. They too, are provided with guidance on posture, simple exercises to help circulation and to combat fatigue and on the need to take regular, short breaks from the screen as part of PSHE.

Blinds are fitted to all classrooms, and the school provides pupils with chairs that provide proper support for the lower back.

Trailing cables

Trailing cables are an obvious trip hazard. The IT Technicians are trained to install work stations, interactive screens and projectors safely, and to ensure that rubber cable covers are used where there is no alternative.

DRIVING AND SCHOOL TRANSPORT

Please refer to the Transport policy (including minibuses) Policy for further information

EDUCATIONAL VISITS (including residential)

Please refer to the Educational Visits Policy.

For the majority of routine off-site during school hours written consent from parents is not required (with the exception of EYFS children). All parents are advised of all visits their children are undertaking via electronic communication, and permission is sought where appropriate via a call back form. Parental consent for routine visits is sought during the induction process and recorded on the student SIMS record.

When planning activities requiring the provider to have a licence under the Activities Licencing Regulations, evidence should be sought and passed to the Bursar.

ELECTRICITY

Heads of departments are responsible for ensuring that items are suitable for the environment they are used in.

All Heads of Department must ensure that electrical items are regularly visibly inspected. Inspections should include checking there are no exposed wires, cracked plugs and sockets or general damage to electrical items.

Only electricians/electrical contractors approved and authorised by the Site Manager are permitted to carry out work on the school's electrical installations.

All management of electrical installations is carried out in accordance with the Electricity at Work Regulations and the relevant Wiring Regulations. The fixed wire installation inspections are undertaken on a rolling programme every 5 years. The Site Manager is responsible for the record keeping and the management of any subsequent remedial actions as a result of the inspections. The responsibility of any new fixed wire electrical installations is also the responsibility of the Site Manager; ensuring installations are carried out in accordance with current regulations and keeping all installations certificates.

Portable appliance testing is completed in line with a programme arranged by the Site Manager.

EMERGENCIES – DEALING WITH

Please refer to the Critical Incident Policy

EVENTS

Risk assessments are documented by the organiser for any events taking place on the College premises so that a risk assessment can be written and necessary safety control measures put in place.

FIRE SAFETY

Fire risk assessments are completed by an external fire consultant.

Please refer to the Fire Risk Policy, Fire Emergency Instructions for hirers and the relevant section of the Staff Handbook.

FIRST AID

Please refer to the First Aid and Illness Policy.

GAS

The Site Manager is responsible for identifying and keeping a record of all gas equipment on the school premises. They will then ensure that relevant servicing and inspection is carried out by competent, Gas Safe approved contractors and keep relevant records.

GLAZING

An assessment of glazing has been completed by the site team and high risk glazing protected.

HEALTH SURVEILLANCE

Health surveillance will be arranged if identified by risk assessment.

Please refer to Occupational Health Policy.

HIGH RISK AREAS

Please refer to the Risky Areas Policy

HIRINGS

The College premises can only be let by the approval of the Bursar and each hire is managed by the Office Manager. When a hire is authorised, a hire agreement is put in place between the school. Relevant risk assessments are obtained from lessees and scrutinised to assess that risks are being managed. Relevant health, safety and fire information is shared by providing a lettings pack.

LEGIONELLA

The statutory duty holder with regard to Legionella control and management is the Site Manager. They will ensure that the legionella risk assessment is up to date, suitable and sufficient.

The written scheme for control is held in the Site Manager's office and a water treatment specialist is contracted to complete regular monitoring and maintenance tasks.

LOCAL EXHAUST VENTILATION

Where relevant risk assessments deem that a local exhaust ventilation system, such as fume cupboards, must be used as a safety control measure, then the relevant Head of Department

must ensure that it is installed, serviced and has its statutory required inspection before use. The aforementioned inspection must be carried out at least every 14 months and the records kept for at least 5 years. Information demonstrating that local exhaust ventilation equipment provides adequate protection must be kept for the life of the equipment. The responsibility for keeping relevant records lies with the Site Manager.

LONE WORKING

Please refer to the Security, Access Control, Workplace Safety and Lone Working Policy.

MAINTENANCE OF PLANT AND EQUIPMENT (WORK EQUIPMENT)

The Site Manager is responsible for ensuring that relevant servicing, planned preventative maintenance and statutory required inspections are carried out on all plant and equipment and that records are stored. Obsolete plant is disposed of in accordance with relevant waste regulations.

MANUAL HANDLING

Heads of Department are responsible, through the risk assessment process, for identifying where manual handling safety control measures need to be implemented.

All staff received manual handling training suitable for their job role in line with the training matrix.

All those who are undertaking manual handling activities should:

- Consider whether the object needs to be moved at all or if better planning would remove the need
- If it does need to be moved can this be by automation, eg using a trolley
- Ensure that those undertaking such tasks have received appropriate training
- Where high risk manual handling is necessary, ensure that a specific risk assessment is undertaken and any required control measures are implemented.

Manual handling aids will be provided as required, where a risk assessment denotes that this is a suitable control measure, such equipment will be checked regularly by the relevant Head of Department.

NEW AND EXPECTANT MOTHERS

The maternity policy is described within the staff handbook. Once notified, the Bursar will ensure that a risk assessment is undertaken to protect individual New or Expectant Mothers.

The HR Officer is to ensure a return-to-work meeting with member of staff returning from maternity leave is carried out by the Line Manager.

NOISE

Excessive noise levels can cause permanent damage to hearing.

Heads of Department are responsible for identifying any sources of noise from equipment and activities (including musical) which may be harmful to users. They will ensure relevant risk assessment(s) are carried out and implement controls that are required as a result of the risk assessment. This may include changing equipment and use, training, ear protection and health surveillance.

ONSITE VEHICLE MOVEMENTS

There is a risk assessment for on-site vehicle movements within the general areas risk assessment which is kept under review by the Site Manager.

Please also refer to the student vehicle policy.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

The requirements for the use of PPE as a safety control measure will be identified through the risk assessment process. Heads of Department are responsible for identifying the need for PPE. Where a need is identified, the aforementioned will:

- Provide PPE to employees (free of charge) and to pupils
- Select PPE suitable for the risks, the employee, the pupils and the work environment
- Maintain the PPE and provide suitable accommodation for storage
- Ensure that the PPE is properly used with training and instruction as necessary
- Provide PPE with the relevant CE mark

RISK ASSESSMENT

Heads of department are required to document risk assessments for the areas and activities in their department at the beginning of each academic year. These are stored in the risk assessment folder on Sharepoint for that academic year and completion is checked by the Bursar. Additional events are risk assessed throughout the year and this is the responsibility of the organiser.

Please refer to the separate risk assessment policy.

SAFEGUARDING

Please refer to the Safeguarding Policy.

SECURITY

Please refer to the Security, Access Control, Workplace Safety and Lone Working Policy.

STRESS

Please refer to the Mental Health and Wellbeing policy.

SWIMMING

The Site Manager oversees the swimming pool and has documented a Normal Operating Procedure (NOP) and Emergency Action Plan (EAP).

WORK AT HEIGHT/LADDERS

Heads of Department are responsible for identifying 'work at height' activities as part of their risk assessment process. Work at height training need is identified and managed through the health and safety training matrix.

The College has a ladder register and these are inspected by the Site Team. Additionally ladder users are responsible for doing pre-use ladder checks, in accordance with their training.

Where a risk assessment identifies the use of other methods of access, such as mobile elevated work platform, scaffolding etc, these will be used. Such access equipment will only be used by those trained and competent to do so.

WORK EQUIPMENT

Heads of Department are responsible for identifying work equipment which requires safety control measures to be implemented as part of their risk assessment process. The aforementioned are then responsible for ensuring that all identified safety control measures are implemented and reviewed as required.

The Site Manager should be notified of any maintenance and/or inspections that are required on specific equipment so these can be included in the central asset management process.

VIBRATION

Where the risk of vibration is identified in risk assessments the Site Manager ensures that suitable controls are put in place.

VIOLENCE IN THE WORKPLACE

Violence in the workplace is unacceptable in any form. The College Behaviour, Rewards and Sanctions Policy outlines the procedure for the management of student behaviour. Receptionists are provided with an emergency alarm in order to call for assistance from the Bursar's office in the event that a visitor or intruder should act in an aggressive or violent fashion. Control of entry and CCTV surveillance mitigates the risk.

VISITORS

All visitors are required to sign in and out at the main reception. Visitors will be collected by their host and escorted to the appropriate area of the school. Visitors will be given relevant coloured lanyards for their badge in line with our Safeguarding Policy. The Receptionist will direct them to the health and safety points on the badge and their host is responsible for their supervision and ensuring they are aware of the arrangements.

Please refer to the Security, Access Control, Workplace Safety and Lone Working Policy.

YOUNG PEOPLE

If any young person under the age of 18 is employed or given a work experience placement, the Bursar will ensure that a relevant risk assessment is completed, the findings communicated to the young person and their supervisor. The person managing or hosting the young person is responsible for ensuring the risk assessment is updated if required and all the safety control measures are implemented.