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Policy statement

Our vision is that every child and young person in the country has a safe and happy childhood, and the foundations they need to thrive. We're passionate about fostering an ambitious, collaborative, and inclusive safety culture, where we all work together to prevent injuries and ill-health.

Communication

We keep you informed by:

- Giving clear information on health and safetyissues.
- Making sure this policy is available to everyone who needs it.
- Investigating when things go wrong, sharing what we learn, and letting you know how we'll do things differently in the future.
- Making and exercising plans for emergencies, and training people in how to respond.
- Providing resources and funds to back health, safety, and wellbeing initiatives.

health, safety, and wellbeing standards, have the skills needed to work with us, and comply with all relevant legislation.

Making sure our partners and contractors follow our

 Consulting with our employees, their representatives, and contractors, and listening to all suggestions on health, safety, and wellbeing so we can improve the way we work in future.

We review this policy every year and make improvements, so please let us know if you have any ideas on how we can do things better.

Managing risks

We manage risks by:

- Identifying and assessing the level of risk in all situations (both normal and abnormal) so that risks can be eliminated or controlled.
- Removing or reducing risks to you, our contractors, and third parties.
- Making sure our everyday activities are safe.
- Assessing risks before we introduce or update equipment and processes.
- Monitoring our performance and dealing with potential risks (our Health and Safety Committee continually monitors our performance against targets and objectives).
- Carrying out audits to highlight how we're managing risks, where we're doing well, and where we need to improve.
- Conducting regular reviews of our health, safety, and wellbeing performance.

Meeting standards

We meet legal standards and keep improving the way we work by:

- Making sure everyone employees, contractors, and volunteers – knows their responsibilities towards each other and the people we help.
- Giving you the support, training, advice, and supervision needed to take care of your health, safety, and wellbeing atwork.

Paul Raberry

Paul Carberry

Chief Executive on behalf of Action for Children



Policy Review: April 2024
Date of next review: April 2025

Introduction and scope

This policy applies to all Action for Children employees, and to all our volunteers and contractors when acting on Action for Children's business, wherever they're based in the UK.

It is Action for Children's policy to comply with all the obligations of UK law that relate to the health, safety, and welfare of all of its staff and other representatives in the UK.

Action for Children aims to comply with all relevant legislation and adopt the highest possible health and safety standards within our business by:

- Promoting a culture of safety excellence through our values and behaviours.
- Ensuring effective health and safety policies and procedures are established, maintained, and monitored.
- Identifying hazards, evaluating risks, and aiming to eliminate or control these risks to reduce sources of injury or loss.
- Providing training to ensure our employees have the necessary skills to achieve these objectives.
- Communicating and consulting with our staff on all issues affecting their health and safety and, in doing so, bring this policy to their attention.

Actively promoting an open attitude to health and safety issues, and encouraging staff to identify and report hazards, so that we can all contribute to creating and maintaining a safe working environment.

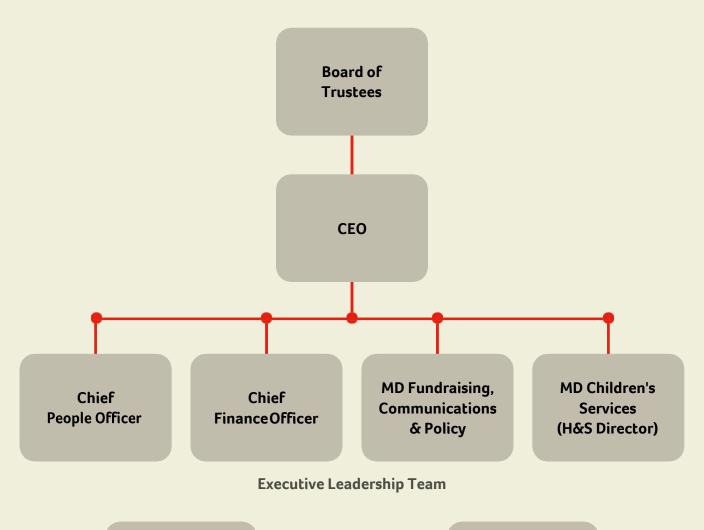
- Maintaining our premises and work equipment to a standard that ensures risks are effectively managed.
- Reviewing our compliance on a regular basis.

The trustees, directors, heads of department, and managers will be responsible for implementing this Health and Safety Policy across Action for Children, working with supervisors and employees on all our premises.

All involved will receive guidance and support from the Health and Safety Service. Action for Children will monitor the effectiveness of the policy on a regular basis and will revise it as often as may be appropriate to its activities.



Health and safetyorganisation



Estates Department Management of Statutory Compliance

Health & Safety

Competent persons Management of Health & Safety at WorkRegulations 1999 (MHSWR)

Responsibilities

The Board of Trustees

The Board of Trustees is ultimately responsible for health and safety. Collectively, its members must ensure that Action for Children has the organisational arrangements and systems in place to enable the effective management of health and safety.

All Board members will act as 'champions' of health and safety, promoting the benefits of positive health and safety practices and behaviours. The Board of Trustees is responsible for ensuring that the policy enables the charity to fulfil its legal duties and emphasises the determination to manage its activities so that standards of health and safety are continuously improved.

They will monitor conditions and the health and safety performance to determine whether the policy is adequately resourced, effective and is being developed to meet changing requirements.

It is the Board of Trustees' responsibility to ensure that:

- Systems are in place to review and update this policy annually.
- Health and safety objectives for the charity are set and monitored.
- Sufficient arrangements, facilities and finances are available for fully implementing this policy.
- Risk assessments and safe systems of work are in operation and staff receive adequate and appropriate training.
- Financial requirements for the charity's health and safety function are adequate.
- The legal implications of relevant legislation are raised with, and understood by, the relevant employees.
- Adequate resources are made available to allow the effective implementation of the charity's health and safety policy.

Chief Executive

The Chief Executive is responsible for ensuring that Action for Children's operations are always executed in such a manner as to ensure, so far as is reasonably practicable, the health, safety and welfare of all employees and others who may be affected by its operations.

The Chief Executive will agree responsibilities for the strategic direction for health and safety management and will ensure that appropriate development and review of procedures are in place. A health and safety report is provided to the Executive Leadership Team (ELT) and trustees every quarter, which gives an update on health and safety performance and current issues.

The Chief Executive will delegate responsibility for implementing this policy to the Deputy Chief Executive and Managing Director of Children's Services (the 'Health and Safety Director') and other Action for Children ELT directors.

Managing Director of Children's Services (appointed Health and Safety Director)

The Managing Director of Children's Services will:

- Carry out the responsibilities delegated by the Chief Executive for the effective implementation of the policy.
- Ensure that ELT directors agree, implement and monitor health and safety objectives for their area of responsibility.
- Sponsor the regular review of health and safety performance within the organisation.
- Ensure that appropriate resources are made available to manage health and safetyrisk.

Directors

All Action for Children directors are responsible for overseeing the implementation of health and safety management by:

- Agreeing, developing, and reporting on health and safety objectives and priorities within their directorate.
- Ensuring the allocation of adequate and appropriate resources for health and safety.
- Monitoring and reviewing health and safety performance and ensuring that prompt action is taken to correct any deficiencies.

Managers

For the purposes of this policy, the term 'manager' includes directors, heads of department, and line managers.

Managers will:

- Familiarise themselves with the Action for Children Health and Safety Policy and ensure that employees under their management have received a briefing on the policy and any relevant safety procedures.
- Provide leadership in matters relating to the management of health and safety within their area.
- Ensure that health and safety training needs fortheir employees are identified and reported through the annual Learning Needs Analysis (LNA) procedure.
- Arrange for all new employees to receive a health and safety induction and training and keep records of the training provided.
- Ensure that staff and other representatives under their management are familiar with and have access to health and safety documentation located on the Action for Children intranet. This includes relevant procedures, templates, and guidance, for example: risk assessment guidance, fire management procedures and guidance, emergency procedures, etc.
- Ensure there are always sufficient trained first aiders and fire wardens to meet the needs of their services.
- Ensure that health and safety inspections are carried out in their area and that any remedial actions required are completed or passed to a manager. The manager will maintain a record of health and safety inspections.
- Retain records of all risk assessments for their respective departments.

Head of Health and Safety

The Head of Health and Safety is the 'competent' person appointed by Action for Children as required by the Management of Health and Safety at Work Regulations 1999 (MHSWR). Reporting to the Director of Safeguarding, the role is to direct and shape the way occupational health and safety is managed across the charity, providing professional advice, with the support of the Senior Health and Safety Advisors, on all matters relating to the occupational health and safety of staff, volunteers, and visitors.

Responsibilities include:

- Developing and overseeing the delivery of the charity's vision to make health and safety 'business as usual'.
- Advising on measures to ensure compliance with health and safety related legislation.
- Identifying, initiating, and developing guidance to help manage and mitigate health and safety risks, and meet legislation obligations.
- Establishing and maintaining mechanisms that provide assurance that both health and safety risks and legislative obligations are being met.
- Establishing and delivering effective mechanisms to enable all staff and volunteers to understand their roles and responsibilities and can work safely.
- Toliaise and seek assurances from the Property
 Department on statutory, technical and compliance assurance matters.

Director of Estates

In addition to their responsibilities at Action for Children, the Director of Estates is accountable in the role of 'landlord'. They should ensure that premises or land the charity owns and leases are safe to occupy and use (including by appropriate subsidiaries). This includes:

- Management and execution for all statutory compliance matters.
- The provision of an environment suitable for its intended use – for example, offices and residences.
- Toensure the estate is designed, constructed and managed in a way that effectively identifies and mitigates health and safety related risks.
- The maintenance and management of buildings and provision of hard and soft facility management services.
- Maintaining building fire risk assessments and mitigation process for all actions arising from them.
- Managing and maintaining building evacuation and fire prevention systems.
- Statutory testing of building fabric and related systems
 for example, water, gas, and electrical systems.
- Seeking assurance from third party contractors that statutory requirement in relation to the estate are being complied with.

- Informing estate and building occupiers/ users of the actions they mayneed to take to maintain their health and safety.
- Consulting with building occupiers/users on any changes to the building that may have an impact on their health and safety.

Staff and other representatives

All staff and other representatives of Action for Children have a responsibility for health and safety and are expected to:

- Reasonably care for the health and safety of themselves and of other persons who may be affected by their acts or omissions, including the children we support.
- Co-operate with managers to enable them to comply with their statutory duties and to implement Action for Children's Health and Safety Policy.
- Not intentionally or recklessly interfere with or misuse anything provided in the interests of health, safety, and welfare.
- Report all health and safetyincidents and concerns to their line manager and the Health and Safety Team.
- Attend training and occupational health appointments.

Communication

A health and safety report will be provided to the ELT and Health and Safety Committee on a quarterly basis. As such, the ELT meetings will discuss health and safety matters. The Health and Safety Team may also attend these meetings when required.

The Health and Safety Committee meets quarterly and will act on behalf of Action for Children, under the chairmanship of the Managing Director of Children's Services. The aim of the group is to act as a forum to encourage engagement, promote discussion, disseminate important health and safety information, and review performance. Membership of the group includes trade union reps, heads of department and stakeholders from all directorates within Action for Children. More information can be found in the Committee's terms of reference.

Health and safety procedures, guidance and templates are accessible to staff and other representatives via the staff intranet. This information will also be shared through Action for Children's internal communication channels, training sessions and safety briefings. Urgent safety information will be emailed to the relevant individuals.



Health and safetyarrangements

Accident reporting and investigation

Anyone working at or visiting any location managed by Action for Children must report health and safety incidents (including injuries or near misses) via the Action for Children incident reporting system.

Significant incidents will be investigated by the Health and Safety Team as soon as possible, with involvement from relevant employees and managers. In the UK, where required, incidents or illnesses is reported under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR). The Health and Safety Team will notify the relevant local authority.

Asbestos

Action for Children will protect staff and other representatives potentially exposed to asbestos as far as is reasonably practicable. Action for Children holds an asbestos register for all managed premises which is available to all on the intranet. A management plan is in place to prevent exposure and no work that could disturb asbestos, for instance drilling, will be authorised unless the register has been checked.

Audits and inspections

Each directorate will be responsible for carrying out periodic safety inspections. The Health and Safety Team will carry out health and safety self-assurance to enable all directors and heads of departments to confirm that they are managing their health and safety responsibilities.

The significant findings of proactive monitoring will be reported at departmental level, through management and Health and Safety Committee meetings. Matters arising should be recorded on an action plan setting out ownership of specific issues and timeframes for corrective action to be taken.

Action for Children will also carry out reactive monitoring through the collection and reporting of work-related incident and ill-health data.

Health and safety performance will be managed proactively across the charity through a plan of directorate and topic-specific audits.

The results of all monitoring activities, including the significant findings of any incident investigations, are submitted to the Health and Safety Committee on a quarterly basis. Incident statistics are included in the quarterly report to the Audit and Risk Committee meeting. An annual report on health and safety is submitted to the Council each year.

Action for Children has a range of proactive monitoring techniques including workplace inspections and audits. These are carried out throughout the year with the support of relevant directorates to identify any issues prior to them causing harm. Records of these activities are kept by the local responsible managers.

Consultation with employees

Action for Children has a statutory duty, under the Safety Representatives and Safety Committees Regulations 1977 and the Health and Safety (Consultation with Employees) Regulations 1996, to provide a suitable forum to formally consult employees on significant matters of health and safety. This duty is met by the Health and Safety Committee.

The main purpose of the Committee is to:

- Provide a forum for consultation on health and safety policy, standards, and guidance.
- Monitor workplace standards and health and safety performance, and to discuss improvements to health and safetypractice.
- To share information on emerging issues and areas of good or best practice.
- Provide a forum for employees to raise concerns over workplace hazards or unsafe practices.

The Committee's full responsibilities are detailed in the terms of reference.

Consultation with trade unions

Action for Children recognises the importance of trade unions in maintaining an effective health and safety management system. We're committed to consultation and ongoing dialogue, and formal consultation on health and safety matters takes place through the Health and Safety Committee.

Control of Substances Hazardous to Health (COSHH)

Any person who introduces or manufactures a source of hazard at Action for Children has a duty towards the control and eventual safe disposal of the hazard. Accurate records must be maintained. The main source of information will be the Material Safety Data Sheets (MSDS) supplied by substance manufacturers/suppliers. The supply of such information is a legal requirement.

Information on chemical substances must be stored and made available to staff who may use such substances and/ or be affected by their use. When working with hazardous substances, risk assessments must be undertaken before work commences, and hazards removed or controlled where possible. Full details on the arrangements for the COSHH are available from the relevant safety document on the staff intranet.

People working with hazardous substances must undertake training as required.

Control of contractors

Action for Children has a legal duty to provide a safe environment for contractors working on our managed properties. Contractors will have responsibilities, under the Health and Safety at Work Act, both for their safety and for that of anyone else who may be affected by their work. This includes a responsibility to co-operate with other duty holders in order to discharge that responsibility. As such, contractors are required to observe Action for Children's Health and Safety Policy, standards and guidance while working under the direct control of the Property Department.

Before engaging any contractor, Action for Children's Property Department will be assured that contractor is competent in respect of both the carrying out of the requested works and the management of the associated health and safety risks.

- All contractors must have the relevant insurances in place while undertaking work.
- All necessary health and safety information will be issued to contractors ahead of and during the work for which they have been engaged.
- Contractors' health and safety performance will be monitored by Action for Children's Property
 Department. Any issues or concerns will be formally followed up by the Property Department.
- All services and settings must inform the Property
 Department of any required building works that includes:
 - Fixing into, or the alteration of, a building's fabric, whether internal or external.
 - Alterations to building service supplies or accessing plantrooms.
 - Breaking into, or excavating within, the property grounds.

Action for Children has a selection criteria and contractor management procedure in place for all new and existing contractors. For more information, please refer to the contractor management procedure.

Display screen equipment

A large percentage of Action for Children employees are habitual users of display screen equipment (DSE). This includes PCs, laptops, tablets, iPads and video conferencing equipment. Action for Children will make appropriate use of display screen equipment throughout the organisation, while safeguarding the health and welfare of those involved in using such equipment.

Guidance for users is available on MyLearn via the intranet. All DSE users must complete the workstation checklist and e-learning module if they have access to MyLearn. Further information can be found on the Health and Safety Executive (HSE) website and from the HSE guide, Working with display screen equipment (DSE): A brief guide INDG36 (rev4).

Electrical safety

All reasonable steps will be taken to secure the health and safety of employees who use, operate, or maintain electrical equipment and installations. Within our workplaces, routine maintenance and testing of fixed wiring and portable appliances will be undertaken by a competent person nominated and managed by the Property Department.

Emergency procedures

Emergency procedures for each workplace are in place. Managers at all Action for Children workplaces will ensure that all employees are made aware of these arrangements and are provided with the appropriate information and training. All workplaces must ensure regular drills are carried out to test these procedures.

Events management

Through assessment, the health and safety risks associated with a proposed event, along with the arrangements required to manage those risks, will be established to determine an event's viability. Where the event goes ahead, the identified risk management measures will be in place. Those responsible for organising these events are responsible for ensuring the required insurance cover is in place.



Fire

Action for Children works to prevent fires in its premises through building design and maintenance, adequately maintained fire detection, and firefighting equipment. All staff receive fire awareness training as a mandatory requirement and local managers must ensure departmental fire wardens are recruited and trained. Action for Children carries out fire risk assessments for the buildings it is responsible for.

First aid arrangements

Managers will make sure all first aid personnel have the necessary training and refresher training, including, where appropriate, ensuring any qualifications are up to date. Managers will also ensure that Action for Children has sufficient levels of first aiders available and have the appropriate training and equipment. Adequate first aid arrangements will be in place for activities and facilities under the respective school or support service's control.

Gas installations

Action for Children will ensure that all works carried out on gas fittings and appliances are undertaken by a competent person in accordance with the Gas Safety (Installation and Use) (Amendment) Regulations 2018.

Instruction, training, and awareness

Members of staff and volunteers will receive the necessary levels of health and safety information, instruction, training, and awareness to enable competency in carrying out their work.

Local mechanisms will ensure any new members of staff are identified so that they receive a health and safety induction within two weeks of commencing employment. Key information (e.g. emergency procedures) will be shared on their first day.

Legionella

Legionella is a waterborne bacteria that can cause flu-like symptoms, known as Legionnaires' disease. It can be spread through poor management of water supply. Action for Children has a water management system in place, consisting of risk assessment, regular sampling, written schemes of work and maintenance programmes. Records of all maintenance and sampling are held by our Property Department.

Lone working

Action for Children will identify any lone working through the risk assessment process and ensure that control measures are appropriate to the level of risk and in accordance with the lone working procedure. For the majority of employees, control measures such as check-ins by phones are sufficient.

Manual handling

All employees who undertake manual handling tasks will be provided with appropriate training and equipment.

Further information can be obtained from the intranet, HSE website and HSE publications.



New and expectant mothers

Specific new and expectant mother risk assessments will be undertaken by the line manager at the time of pregnancy notification. These must be updated throughout the pregnancy and on the return to work.

Occupational safety and health assistance and support

An occupational health service is provided under contract to Action for Children and is managed by the People Directorate. Health surveillance requirements will be considered as part of the relevant risk assessment processes. This may include health monitoring for certain roles or vaccinations for those working with children, occupational health referrals where necessary, and access to other health and wellbeing services. If a manager requires occupational health advice for an employee, they can access the Occupational Health Portal direct or contact the People Advice Team for support.

Action for Children provides an Employee Assistance Programme (EAP) which covers advice and counselling of various kinds. It is available to all staff, volunteers, and foster carers.

Personal protective equipment

Action for Children provides personal protective equipment (PPE) when the risk presented by a work activity cannot be eliminated or adequately controlled by other means. All PPE must be suitable for the intended purpose, comply with the Personal Protective Equipment Regulations 2002 and have appropriate marking (UKCA, CE, etc.). More information can be found in the personal protective equipment procedure.

Risk management and assessments

As an employer, Action for Children must carry out risk assessments in compliance with UK legislation. Risk assessment is a process of identifying significant risks within workplace location, or associated with an activity, and ensuring that proportionate controls are put in place to protect those who may be affected.

At Action for Children, risk assessments will only be created by suitably trained individuals. Online training is available through Action for Children's MyLearn system. Specific procedures and templates are available through the staff intranet. Risk assessments, signed off by the appropriate manager, should be in place for every Action for Children managed workplace (or activity as appropriate). These should be reviewed and updated at least once a year, or more often if there are significant changes to the hazards present, control measures in place or in

the event of a serious incident. Risk assessments must be signed (electronically) by all individuals covered. Further information on risks is set out on the HSE website, and in HSE publications and quidance.

Safe systems of work

Safe systems of work (SSOW) are required when hazards cannot be adequately controlled through risk assessment alone. SSOW must be reviewed annually and signed by all individuals participating in the task for which they have been written. More information can be found in the safe systems of work procedure.

Health and safety procedures

Action for Children has a written set of instructions designed to implement the Health and Safety Policy.

Health and safety procedures outline: the task overview; who is responsible for what, including management responsibilities; what steps need to be taken; monitoring arrangements; and links to all related supporting resources. Action for Children's health and safety procedures should be used to ensure safe and healthy working practices where risks to employees and others who may be affected by activities have been identified.

Slips and trips

Slips and trips are common causes of injuries for employees and visitors within both office and outdoor environments. Everyone can help to reduce slip and trip hazards through good awareness, good housekeeping, and reporting hazards if they cannot be resolved immediately.

Statutory inspections

The Property Department will ensure that all plant and equipment under Action for Children's direct responsibility, which requires statutory testing and examination (including lifts and electrical appliances), has been placed on a system for routine maintenance and testing. Although this task is normally completed under a contract managed by the Property Department, managers will ensure that all new equipment has been placed on the register by contacting the Property Department's helpdesk.

Stress

Action for Children recognises its duty to protect employees from work-related stress. Managers have a responsibility to identify and manage stress at work and are supported by the People Directorate to address specific concerns. The Health and Safety Team will work closely with the People Directorate where cases of stress are identified. Individual members of staff can use the various organisational-wide support mechanisms where they perceive stress is being experienced and is adversely impacting health.

Temperatures

Action for Children will make every effort to ensure that workplace temperatures are reasonable and comfortable. Action for Children will manage heating and ventilation systems to provide reasonable working temperatures for employees working in our offices and facilities and will make adjustments to accommodate seasonal changes where this is practicable.

Travel

There are specific requirements in place for staff and other representatives who travel on Action for Children business. These are outlined in the Travel Policy.

Vehicle and/or transport use

Employees using Action for Children vehicles, whether on private land or on public roads, must hold the appropriate licenses. There is a vehicle/transport management policy in place which all employees who use vehicles must follow.

Violence and aggression

The HSE defines work-related violence as: 'any incident in which a person is abused, threatened, or assaulted in circumstances relating to their work'. Risk assessments are carried out to identify and implement measures to protect employees at risk of violence or aggression while at work. Any threat of or incidents of violence or aggression must be reported to line managers who will investigate and record.

Young people

Any activities involving children or young people (under 18) are specifically risk assessed. Information on safeguarding issues can be found in the Safeguarding Policy.

Wellbeing

Action for Children has a strategy in place to enable the charity to take a holistic approach to wellbeing. It provides a range of resources, tools, and training to promote the wellbeing agenda, develop our managers, create a climate where we openly talk about mental health, and provide good working conditions for our staff to thrive.

Work at height

Action for Children has specific procedures for working at height and working from ladders (and stepladders). Employees are provided with appropriate training for working on ladders and stepladders. Access to roofs and other work at height is risk assessed and is restricted to competent contractors.

Applicable Legislation

Action for Children shall meet health and safety obligations as outlined in the following legislation:

Health & Safety at Work Act (HSWA, 1974)

Safety, Health & welfare Act (HSW, 2005)

Ireland Food Safety Act 1990

The Fire Safety Act 2021

Employers Liability Compulsory Insurance Act 1969

Management of Health & Safety at Work Regulations (MHSWR, 1999)

Manual Handling Operations Regulations (MHO, 1992)

Health & Safety Display Screen Equipment Regulations (DSE, 1992)

Control of Substances Hazardous to Health Regulations (CoSHH 2002)

Control of Substances Hazardous to Health Regulations (Northern Ireland) 2003

Management of Health and Safety at Work Regulations (Northern Ireland) 2000

Workplace Health, Safety and Welfare Regulations (WHSWR 1992)

Workplace Health, Safety and Welfare Regulations (Northern Ireland) 1993

The Personal Protective Equipment Regulations (PPE, 2022)

Lifting Operations & Lifting Equipment Regulations (LOLER, 1998)

Work at Height Regulations (WAH, 2005)

Construction Design Management Regulations (CDM, 2015)

The Health and Safety First-Aid Regulations 1981

Gas Safety (Installation & Use) Regulations 1998

Electricity at Work Regulations 1989

Provision and Use of Work Equipment Regulations (PUWER, 1998)

Provision and Use of Work Equipment Regulations (Northern Ireland) 1999

Control of Asbestos at Work Regulations (CAR, 2012)

Regulatory Reform Fire Safety Order (RRFSO, 2005)

Reporting of Injuries Diseases and Dangerous Occurrence Regulations (RIDDOR, 2013)

Reporting of Injuries, Diseases and Dangerous Occurrence Regulations (RIDDOR, 1997), NI

Health & Safety Information for Employees Regulations (HSIER, 1989)

The Health & Safety Consultation with Employees Regulations (HSCER, 1996)

The Safety Representatives and Safety Committees Regulations SRSC, 1977)

The Safety Representatives and Safety Committees Regulations (Northern Ireland) 1979

Pressure Systems Safety Regulations 2000

Food Hygiene (England) Regulations 2006

The Control of Legionella Bacteria in Water Systems ACOP L8 2013

The Smoke-free (Premises & Enforcement) Regulations 2006

The Smoke-free (Signs) Regulations 2007

The above list is not exhaustive, a full list of health and safety legislation applicable to Action for Children can be found on the health and safety hub.



Action for Children

3 The Boulevard Ascot Road Watford WD18 8AG

actionforchildren.org.uk



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