

Health and Safety Policy

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Operated by: Nudge Education Ltd · **Version:** Dec 2025 · **Owner:** Director of Operations

Health and Safety Policy (Incorporating; Risk Assessment Policy, Accident & Safeguarding Reporting Procedure & First Aid Policy)

December 2025 Status; Statutory To be Reviewed December 2026 This is the statement of general policy and arrangements for Nudge Education Limited;

This policy covers staff, associates/contractors (including contractors) and students of Nudge Education and applies to both premises operated by the organisation and commissions managed by Nudge Education. It aims to show how the Directorate discharges their duties under the Health and Safety at Work Act 1974. We understand the implications that not informing staff, associates/contractors(including contractors) and students of this policy and providing relevant training may cause severe harm to the people it affects and the reputation & financial health of the organisation.

Where the word 'associate' is used in the policy this refers to contractors who work on behalf of Nudge Education.

Diego Melo: Chief Executive Officer has overall and final responsibility for Health and Safety

Brian Mair: Director of Operations has day-to-day responsibility for ensuring this policy is put into practice.

Brian Mair Diego Melo

5th December 2025 5th December 2025

Version Control Author Date of Update

1.0 Brian Mair 22nd August 2022

1.1 Brian Mair 24th August 2023

2.0 Marcos Rojo 20th September 2024

3.0 Brian Mair 30th September 2025

3.1 Brian Mair 5th December 2025

Nudge Education Health and Safety Committee;

Brian Mair: Director of Operations (IOSH accredited)

Diego Melo: Chief Executive Officer

External Expert Advisor;

Kym Allen Associates, Health and Safety Consultants:

<https://www.kymallanhsc.co.uk/>

01228 210152 The named organisation is appointed to provide health and safety advice and assistance as required by Regulation 7 of the Management of Health & Safety Work Regulations 19

At Nudge Education, health and safety is a shared responsibility embedded across all levels of the organisation. Clear lines of accountability ensure that appropriate systems are in place to assess, manage and monitor risks, respond to incidents, and comply with legal and safeguarding duties.

- Strategic oversight of health and safety
- Ensure policy compliance and review audits Board of Directors - Approve strategic changes and guidance

CEO (Diego Melo) - Final accountability for H&S compliance

- Day-to-day management of H&S activity
- Ensure emergency procedures and business continuity plans are in place
- Provide access to H&S resources and emergency training
- Promote a positive and open H&S culture across the organisation
- Review and sign off all policy updates
- Oversee quality reviews, spot checks, and policy audits
- Monitor RIDDOR reports and lead on policy review cycles
- Ensure H&S issues are actioned promptly

- Lead annual policy review unless risk changes demand earlier Director of Operations review (Brian Mair)
- Coordinate regular H&S meetings (fortnightly or ad hoc)
- Provide strategic guidance and operational oversight
- Ensure adequate H&S resources (e.g. first aid kits, fire safety equipment)
- Commission expert advice when legislation or guidance changes
- Review accidents, near misses, and associated trends
- Discuss staff/contractor feedback and incident investigations
- Ensure H&S documentation is accessible and training is Health & Safety Committee recorded
- Ensure integration of safeguarding into risk management
- Be informed of any incident with safeguarding implications Designated Safeguarding - Collaborate on risk assessments linked to safeguarding Lead (DSL) thresholds
- Provide ongoing training to staff and associates Regional & Assistant - Observe delivery sessions for H&S compliance Regional Leads - Monitor review cycles for risk assessments (minimum annually)
- Conduct health and safety inductions for all staff & associates
- Keep records of inductions and training completion
- Design role-appropriate training programmes Leads, Coordinators, - Investigate accidents/incidents and complete official reports as Managers needed
- Verify staff qualifications, DBS checks and references
- Ensure new associates/contractors are competent in H&S Recruitment / HR / People matters Team - Organise training for de-escalation and behaviour support
- Complete and review risk assessments
- Maintain accident logs H&S Officer (or Delegated - Coordinate training tracking Person) - Support monitoring of contractor H&S documentation
- Understand and follow the H&S policy (sign to confirm)
- Comply with all organisational procedures and training
- Take reasonable care for personal and others' safety
- Complete appropriate risk assessments
- Supervise students safely and advise on equipment use
- Report unsafe practices or conditions to line manager or H&S lead
- Follow hygiene and safety rules, especially in emergencies
- Use official documentation to report incidents or concerns

- Highlight gaps in risk assessments and contribute to All Staff & improvement Associates/Contractors - Report incidents promptly
- Follow safety instructions from staff
- Comply with Nudge Education's agreed safety standards Students - Follow hygiene and emergency protocols where appropriate

Throughout this policy, where specific processes or tasks are documented, a supporting Standard Operating Procedure (SOP) will be available on our company drive and made available to all staff and relevant stakeholders.

Risk Assessment Policy

Nudge Education uses a Risk Assessment Matrix (source: crisisprevention.com) to evaluate the severity and likelihood of hazards across all operations. All staff must understand how to identify, assess and manage risks using this matrix, and apply control measures accordingly.

Standard Risk Assessments

Three baseline risk assessments must be conducted for all new student engagements:

- Lone/Home Working Risk Assessment
- Transporting Student Risk Assessment
- All Visits Risk Assessment

Further student-specific or activity-specific risk assessments will be completed where necessary and stored securely. These will be shared with all staff involved in the commission.

Staff and associates/contractors will be given appropriate training on how to conduct and review risk assessments prior to conducting work for Nudge Education.

Risk Assessment Review Protocol

Risk assessments must be reviewed promptly after any accident, incident, near miss, or when significant changes occur, as well as at least once each academic year. They should also be revisited whenever new safeguarding information arises. Reviews will consider a broad range of risk domains, including health and medical concerns, emotional or behavioural regulation,

absconding or disengagement, mental wellbeing, exposure to substances, risks of peer exploitation or gang involvement, family or home environment factors, and any history of risk-taking behaviours.

Nudge Education operates a hierarchy of controls in relation to risk assessment as shown in the diagram below. From left to right, this is the priority that we approach hazards and risk assessment planning.

Training & Competency All staff and associates must complete:

- H&S Induction Training prior to beginning work, relevant to the work being carried out.
- Annual refresher training in H&S, safeguarding, and lone working, relevant in relation to work being carried out.
- Activity-specific training (e.g. transporting students, medical protocols, complex needs support) relevant to the work being carried
- For staff who work within Nudge Education premises, site risk assessments and H & S inductions must also be carried out.

Records of all training are stored securely and monitored by managers.

Accident, Incident, Near Miss & Dangerous Occurrence Procedure

Purpose and scope

This procedure applies to all employees, associates/contractors, volunteers, pupils/students, visitors and activities on or off site (including home-tuition, transport, trips, placements and third-party venues). It covers:

- Accident (injury or ill-health), Incident (unplanned event causing or with potential to cause harm), Near Miss (no harm but could have), and Dangerous Occurrence (serious specified event).
- Safeguarding considerations where the event involves a child/young person or could indicate unsafe supervision, environment, or conduct.

We promote a no-blame, learning culture: reporting is encouraged and never punitive.

Definitions (for clarity)

- Accident: Unplanned event causing injury/ill-health.

- Incident: Unplanned event that caused or could cause harm (includes violence/aggression, behavioural crises).
- Near Miss: No injury/ill-health but clear potential.
- Dangerous Occurrence: A specified serious event (e.g., equipment failure, fire/explosion, structural collapse) that may trigger RIDDOR reporting.
- RIDDOR-reportable: Fatalities, specified injuries, over-7-day incapacitation, occupational diseases, and specified dangerous occurrences. Annex B of this policy gives more detail on RIDDOR-reportable injuries

Immediate recording (at once)

Responsible: Person witnessing / first aware (or most senior person present).

Actions (do all):

1. Make the area safe; call 999/first aider if required.

2. Provide first aid; arrange escort to urgent care if needed; inform

parent/carers where a child is involved.

3. Record immediately in the organisational reporting system/Accident

Book: who, what, where, when, injury/impact, actions taken, witnesses, photos/CCTV reference, equipment IDs.

4. Safeguarding check: if a child/young person is involved or there are

concerns about supervision/behaviour/environment or staff conduct, notify the DSL (or deputy) immediately as well as logging the H&S report.

5. Preserve evidence for investigation (do not move plant/equipment after

serious injury/dangerous occurrence unless necessary for safety).

If in doubt who should take ownership, the Director of Operations assumes responsibility.

Triage & investigation (start within 24 hours) Default Owner:

- Line Manager / Site Lead for low–medium severity.
- Director of Operations for high/critical events, complex cases, RIDDOR triggers, safeguarding crossover, multi-site impact, contractor incidents, or if the appropriate manager is unavailable.

Within 24 hours (or sooner for serious events):

- Classify severity (Low / Medium / High / Critical) using injuries, lost time, potential severity, and safeguarding indicators.
- Immediate controls: isolate hazards, withdraw equipment, increase supervision, suspend activity/visit if needed.
- Plan the investigation (proportional to severity): Take statements, time-line the event, secure photos/CCTV, collect training/maintenance/risk assessment records.
- Review relevant risk assessments, SOPs, care plans, behaviour plans, Positive Handling plans.
- Safeguarding pathway: DSL (or deputy) reviews in parallel where a child is affected; manage information-sharing on a need-to-know basis.
- RIDDOR triage: H&S Lead/Director of Operations decides if reportable and ensures statutory notification to HSE within required timescales (<http://www.hse.gov.uk/riddor>.)

Review for learning & update controls (close actions within 5 working days)

Owner: Director of Operations (include DSL for child-related cases).

Outputs:

Following an incident, the review process must identify the root causes at immediate, underlying, and systemic levels. Corrective and preventive actions are then agreed, with clear owners and deadlines, which may include changes to supervision, environment, equipment, staffing, or behaviour support. Risk assessments and procedures are updated and reissued, and staff are briefed through toolbox talks or equivalent. Any training or competence gaps are addressed through induction, refresher, or specialist training. Communication is provided to affected staff and, where appropriate, parents, carers, or

commissioners. High-risk activities or areas remain closed until the Director of Operations confirms that revised controls are safe.

Escalation matrix (who leads)

- First Aider on scene: immediate care; handover to emergency services where applicable.
- Line Manager / Site Lead: most Low/Medium cases; initiates 24-hr investigation.
- Director of Operations (default owner when unsure): any High/Critical severity, RIDDOR triggers, child injury needing medical treatment, suspected unsafe supervision/conduct, multi-site impact, media/reputation risk.
- CEO: briefed on Critical events, fatalities, multi-agency investigations, regulatory visits.
- DSL: parallel lead on safeguarding concerns (child-on-child harm, staff conduct, possible neglect/abuse indicators).
- External H&S Adviser: consulted on technical/complex hazards and for Serious Incident reviews.

External notifications (statutory & contractual) RIDDOR (HSE) – Director of Operations/H&S Lead ensures:

- Without delay: fatalities, specified injuries, dangerous occurrences.
- Within 15 days: over-7-day incapacitation.
- Occupational diseases: on diagnosis (where reportable). Keep HSE reference numbers in the incident file.

Other notifications (as applicable):

- Police/Local Authority where required (e.g., serious injury on a public highway, safeguarding offences).
- Commissioners/Insurers per contract/policy conditions.

Record-keeping & data protection

Accident/incident records: secure, accurate, and contemporaneous; link H&S log to safeguarding record where applicable.

Retention (minimum):

- Accident form entries: 3 years from incident (or longer where civil claims may arise)
- Child injury records: retain until the child's 25th birthday (Limitation Act timeframes).
- RIDDOR records: at least 3 years; we will retain 6 years as organisational standard.
- Access is restricted; information shared on a need-to-know basis only.

Monitoring, assurance & learning

- Monthly: H&S Committee reviews incident trends, CAPA completion, safeguarding crossovers, and RIDDOR status.
- Termly: The Director of Operations submits an H&S and Safeguarding Safety Report to SLT/Board (including lessons learned, training uptake, audit findings).
- Post-incident debriefs: offered to staff/students; consider wellbeing support and supervision following traumatic events.
- Audits/inspections: unannounced spot checks; annual programme aligned to risk profile.

10. Special contexts

- Off-site/Trips/Transport: Trip Leader/EVC must follow this procedure; stop/return if controls cannot be assured.
- Lone working/home tuition: immediate check-ins after incidents; review lone-working risk assessment before next visit. Violence & aggression/behavioural crises: de-escalate per training; record as incident; review Positive Handling plan and behaviour supports.
- Contractors/visitors: must report to our system; their manager and our Site Lead co-investigate; work may be suspended pending controls.

If the incident meets the criteria outlined in RIDDOR 2013, a formal report must be made online or via telephone to the Health and Safety Executive. This includes:

- Fractures or amputations
- Loss of consciousness or serious burns
- Injuries requiring hospital admission over 24 hours
- Dangerous occurrences involving equipment, fire, or gas
- Occupational diseases diagnosed by a medical professional

- Over 7-day incapacitation if a worker

Reports must be made within 15 days of an accident, with the exception of specified injuries, dangerous occurrences and fatalities that must be made on the same day.

Designated Safeguarding Leads (DSLs) must also be informed where safeguarding concerns emerge from any incident.

If any of the accidents or dangerous occurrences/near misses fall under the categories as listed in the HSE publication; "Reporting accidents and incidents at work; a brief guide to the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)"

A report must be made by an appropriate person using the forms at; <http://www.hse.gov.uk/riddor>.

All incidents can be reported online but a telephone service remains for reporting fatal and specified injuries only. Call the Incident Contact Centre on 0845 300 9923 (opening hours Monday to Friday 8.30 am to 5 pm).

A list of specified injuries and dangerous occurrences are listed in Annex B of this policy

In the event of RIDDOR being contacted, Diego Melo and Brian Mair must be informed.

First Aid Policy

For every intervention undertaken by Nudge Education, at least one person working on that intervention will have valid and up to date first aid training. First aid IS NOT to be administered by anyone who is not trained, the student should be taken to the nearest walk-in centre, or a first-aider sought from the venue where the intervention is taking place if there is one.

A record of all qualified first aiders and details of training will be kept on record by Nudge Education and will be made available to commissioners and other bodies upon request.

An emergency contact number for each student will be kept by Nudge Education and a parent/carers will be informed as well as the commissioner if first aid is administered.

In the case of head injuries, the student will be immediately sent/taken to hospital.

For serious and life-threatening injuries, an ambulance will be called immediately whilst emergency first aid is being administered. When external venues are to be used such as libraries or community centres, part of the initial checks will be to ensure that there are trained first-aiders on site at all times.

All staff and associates/contractors are/will be provided with an approved first aid kit before they start their first intervention. It will be their responsibility to keep this stocked. They will also be trained in how to administer basic first aid.

Using the guidance from:

<https://www.gov.uk/government/publications/first-aid-in-schools/first-aid-in-schools> Is-early-years-and-further-education

The first aid kit should contain:

- a leaflet giving general advice on first aid (Annex A of this policy) – HSE information is available
- individually wrapped sterile adhesive dressings (assorted sizes)
- sterile eye pads
- individually wrapped triangular bandages (preferably sterile)
- safety pins
- medium sized individually wrapped sterile unmedicated wound dressings
- large sterile individually wrapped unmedicated wound dressings
- non-latex disposable gloves

Medication Policy

As part of the initial assessment Nudge Education undertakes with a student we will ask about any medication that a student has to take regularly. As part of this process we will;

- Ensure that any student that needs support in taking their own medication will be paired with a staff member or associate who is trained in the administration of medication.
- Confirm that any medication is officially labelled with the student's name and date of birth and dosage information on original packaging

- Request that the parent or guardian (including residential and care settings) will administer the medication for that student prior to the education session commencing.
- Report to our commissioner if a student requests or takes medication that is not in their initial assessment or student pen portrait to safeguard them effectively.
- If emergency medication needs to be administered in a situation that our staff or associates/contractors are not trained for, the emergency services will be contacted.
- Ensure that any medication given is recorded including information of dosage & time of administration
- Ensure that any staff who are required to administer medication are giving appropriate training or guidance.

This guidance is further detailed in our standalone Administration of Medication Procedures

Fire Safety Policy;

Nudge Education currently operates a small number of offices across the country. They will not be used to deliver student interventions. In this environment the organisation will;

- Ensure all visitors are signed in and out of the premises so there is an up to date register in case of an evacuation
- All non-hardwired equipment will be monitored on a regular basis.
- Ensure that we have a copy of the landlord's fire risk assessment and emergency procedure policy and processes to update our staff and visitors accordingly.
- Appoint a fire warden to be the main point of contact for Nudge Education staff, contractors and visitors who are on site at the point of an emergency. The name of this person will be written on a sign that is visible within the premises and the warden will wear a hi-visibility vest to easily identify themselves to others.
- Keep up to date plans of escape routes.
- Hold or participate in a fire drill and keep a record of this on a six monthly basis.

For sites where Nudge Education will hire on a temporary basis for education purposes, the organisation will;

- Follow all processes that the landlord requires us to for the purpose of fire safety such as drills, alarm tests and such like.
- Appoint one person who will be the main point of contact during a fire or other emergency.
- Make sure that a copy of all relevant fire and building risk assessments are seen before a hire agreement is signed.
- Complete our own H & S vetting form making sure we have noted access and egress routes, muster points, potential hazards and also accessibility options for people who have mobility problems.

Monitoring and Policy Review This policy will be reviewed:

- Annually, or
- Following a serious incident, change in legislation, or significant operational change

All staff and associates must comply with this policy, contribute to its review and report gaps or hazards using approved documentation

Linked Policies & Procedures:

Business Continuity Procedure

Hybrid and Remote Working Policy

Child Protection and Safeguarding Policy

Trauma-informed Practice Policy

Physical Intervention Policy

Anaphylaxis and Auto-injector procedures

Administration of Medication Procedures

Annex A- First Aid General Precautions: (Source <https://www.hse.gov.uk/pubns/indg347.htm>)

Annex B; Reportable injuries and dangerous occurrences under RIDDOR 2013

What must be reported?

Work-related accidents

For the purposes of RIDDOR, an accident is a separate, identifiable, unintended incident that causes physical injury. This specifically includes acts of non-consensual violence to people at work. Not all accidents need to be reported, a RIDDOR report is required only when:

■ the accident is work-related; and ■ it results in an injury of a type which is reportable (as listed under 'Types of reportable injuries'). When deciding if the accident that led to the death or injury is work-related, the key issues to consider are whether the accident was related to: ■ the way the work was organised, carried out or supervised; ■ any machinery, plant, substances or equipment used for work; and ■ the condition of the site or premises where the accident happened. If none of these factors are relevant to the incident, it is likely that a report will not be required. See Example incidents to further understand things that do/don't need to be reported

Types of reportable injury

Deaths

All deaths to workers and non-workers must be reported if they arise from a work related accident, including an act of physical violence to a worker. Suicides are not reportable, as the death does not result from a work-related accident.

Specified injuries to workers

■ The list of 'specified injuries' in RIDDOR 2013 (regulation 4) includes: ■ a fracture, other than to fingers, thumbs and toes; ■ amputation of an arm, hand, finger, thumb, leg, foot or toe; ■ permanent loss of sight or reduction of sight; ■ crush injuries leading to internal organ damage; ■ serious burns (covering more than 10% of the body, or damaging the eyes, respiratory system or other vital organs); ■ scalpings (separation of skin from the head) which require hospital treatment; ■ unconsciousness caused by head injury or asphyxia; ■ any other injury arising from working in an enclosed space, which leads to hypothermia, heat-induced illness or requires resuscitation or admittance to hospital for more than 24 hours.

Over-seven-day injuries to workers

This is where an employee, or self-employed person, is away from work or unable to perform their normal work duties for more than seven consecutive days (not counting the day of the accident)

Injuries to non-workers

Work-related accidents involving members of the public or people who are not at work must be reported if a person is injured, and is taken from the scene of the accident to hospital for treatment to that injury. There is no requirement to establish what hospital treatment was actually provided, and no need to report incidents where people are taken to hospital purely as a precaution when no injury is apparent. If the accident occurred at a hospital, the report only needs to be made if the injury is a 'specified injury' (see above). Reportable occupational diseases Employers and self-employed people must report diagnoses of certain occupational diseases, where these are likely to have been caused or made worse by their work.

These diseases include (regulations 8 and 9):

■ carpal tunnel syndrome; ■ severe cramp of the hand or forearm; ■ occupational dermatitis; ■ hand-arm vibration syndrome; ■ occupational asthma; ■ tendonitis or tenosynovitis of the hand or forearm; ■ any occupational cancer; ■ any disease attributed to an occupational exposure to a biological agent.

ANNEX C:

Accident & Incident Reporting Form (Source: asana.com)

NEO Online Addendum

This addendum applies the canonical Nudge Education policy above to the online provision context of Nudge Education Online (NEO). It is sourced from NEO - Health and Safety Policy v04.26.docx.

NEO BY NUDGE EDUCATION

Health and Safety Policy Nudge Education Online

Policy Owner	Director, Nudge Education Online & Head of School
Approved	April 2026
Review Date	April 2027
Version	04.26
Operating Company	Nudge Education Ltd (Company Number 10192753)
Proprietor	Diego Melo
Accreditation Route	Online Education Accreditation Scheme (OEAS) — accreditation in progress

This policy applies to all learners, staff, practitioners, contractors, volunteers and visitors of Nudge Education Online (NEO). NEO is a fully online alternative provision for learners aged 11–18, operated by Nudge Education Ltd. NEO is not a DfE-registered independent school and is not subject to Independent Schools Inspectorate (ISI) inspection. NEO is pursuing OEAS accreditation only.

1. Policy Statement and Purpose

Nudge Education Online (NEO) is committed to ensuring, so far as is reasonably practicable, the health, safety, and wellbeing of all learners, staff, practitioners, contractors, and volunteers engaged in NEO's provision. As a fully online alternative provision, NEO's health and safety duties operate differently from those of a provider with physical premises, but they are no less important. This policy sets out how NEO fulfils its obligations under the Health and Safety at Work Act 1974, the Management of Health and Safety at Work Regulations 1999, and OEAS accreditation criteria relating to welfare, health, and safety. It reflects NEO's commitment to the Six Cornerstones pedagogy, which places Movement, Rest, and Nutrition alongside academic learning as essential elements of a healthy educational experience. The policy recognises that learners access NEO from their homes or other community settings, and that primary responsibility for the physical learning environment rests with

parents, carers, or residential settings. NEO supports families with guidance, resources, and proactive pastoral oversight to promote safe and healthy engagement with online learning. NEO is not a DfE-registered independent school and is not subject to ISI inspection. Maintained-sector and ISI-related health and safety frameworks are used as reference material.

2. Scope

This policy applies to: All online learning activities delivered via Google Classroom, Google Meet, and Google Workspace. All staff, practitioners, contractors, and volunteers working for or on behalf of NEO, whether employed or self-employed. All learners aged 11–18 enrolled at NEO. Parents, carers, and residential settings supporting learners' participation. Any face-to-face or hybrid activities, enrichment events, or off-site visits organised by NEO (where applicable). The physical home-working environments of all remote staff and practitioners.

3. Legal and Regulatory Framework

Health and Safety at Work Act 1974 Management of Health and Safety at Work Regulations 1999 Display Screen Equipment (DSE) Regulations 1992 (as amended 2002) Health and Safety (First Aid) Regulations 1981 Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR) Equality Act 2010 (reasonable adjustments) Keeping Children Safe in Education 2026 (KCSIE) Working Together to Safeguard Children 2023 (updated May 2025) Online Safety Act 2023 Fire Safety Order 2005 (applicable to any physical venue used by NEO) UK GDPR and Data Protection Act 2018 ICO Children's Code (Age Appropriate Design Code) OEAS accreditation criteria (welfare and safety strand)

4. Roles and Responsibilities

Role	Responsibility
Proprietor	Has overall responsibility for health and safety. Ensures NEO complies with statutory obligations and OEAS accreditation criteria. Approves this policy

Role	Responsibility
	and reviews it annually. Ensures adequate resources are allocated to health and safety.
Director, NEO & Head of School	Oversees day-to-day implementation of health and safety arrangements. Coordinates risk assessments for online learning platforms, staff home working, and any in-person activities. Ensures all staff receive appropriate training. Acts as the Health and Safety Coordinator during the initial period.
Designated Safeguarding Lead (DSL)	Monitors the intersection of health, safety, and safeguarding. Ensures that health and safety concerns that may indicate welfare or safeguarding issues are escalated appropriately. Reviews incident logs and identifies patterns.
SENCo	Ensures that health and safety arrangements include reasonable adjustments for learners with SEND or disabilities. Monitors the accessibility and ergonomic suitability of online provision for learners with additional needs.
Qualified subject-specialist teachers	Follow safe online teaching practices. Remain alert to signs of screen fatigue, discomfort, or distress during live lessons and escalate concerns promptly.
Named practitioners (mentors)	Maintain pastoral oversight of each learner's engagement; notice patterns that suggest health, safety, or wellbeing concerns at home; escalate to DSL or SENCo as appropriate.

Role	Responsibility
All staff, contractors, volunteers	Follow safe working practices. Maintain a safe home-working environment. Complete required training. Report hazards, incidents, and near misses promptly. Remain alert to signs that a learner's home environment may pose health or safety risks.
Parents, carers and residential settings	Retain primary responsibility for the physical environment in which learners access online learning. Ensure learners have a safe, appropriately set up space for learning. Communicate any health, accessibility, or environmental concerns to NEO.

5. Online Learning Health and Safety

The delivery of education online introduces specific health and safety considerations that differ from those in a traditional school setting. NEO addresses these proactively.

5.1 Digital Safety and Platform Security

All online learning is delivered through Google Classroom, Google Meet, and Google Workspace, configured with appropriate security, privacy, and moderation settings. The NEO Online Safety and Acceptable Use Policy sets out detailed measures for protecting learners from online harms, including inappropriate content, contact, and conduct. Staff receive training on secure use of Google platforms, including managing meeting access, controlling screen sharing, and moderating chat functions. Data protection measures are in place in accordance with the NEO Data Protection, Confidentiality and Privacy Policy and the ICO Children's Code.

5.2 Screen Time and Wellbeing

NEO recognises the potential health impacts of prolonged screen time and embeds the Six Cornerstones pedagogy — particularly Movement, Rest, and

Nutrition — to promote healthy engagement: Timetables are designed to include regular breaks between live lessons, with explicit encouragement to step away from screens. Live lessons incorporate movement breaks, stretch prompts, and varied activity types to reduce sustained screen exposure. Staff are trained to recognise signs of screen fatigue, digital overwhelm, or isolation in learners, and to respond with pastoral support via the named practitioner. Learners and families receive guidance on the 20-20-20 rule (every 20 minutes, look at something 20 feet away for 20 seconds) and the importance of natural light and hydration. Asynchronous learning options allow learners to manage their time and regulate their screen exposure across the day.

5.3 Mental Health and Emotional Wellbeing

Staff remain alert to the impact of online learning on mental health, including isolation, anxiety, low mood, and EBSNA-related dysregulation. Regular pastoral check-ins with the named practitioner, tutor sessions, and wellbeing surveys provide opportunities for learners to raise concerns. The NEO Behaviour and Regulation Policy promotes a co-regulatory, trauma-informed approach to supporting learners who may be experiencing difficulty. Where concerns arise about a learner's mental or emotional wellbeing, staff follow the safeguarding reporting procedures and signpost to external support services where appropriate.

5.4 Safeguarding Concerns Arising from the Home Environment

Because learners access NEO from home or residential settings, staff may observe or become aware of environmental health and safety concerns during live lessons or through pastoral contact. These may include: Evidence of an unsafe, unsuitable, or overcrowded living environment. Exposure to domestic abuse, substance misuse, or other harmful behaviours. Lack of adequate food, heating, or basic amenities. Signs of self-harm, disordered eating, or substance use. Where any such concerns arise, staff must follow the NEO Child Protection and Safeguarding Policy and report immediately to the DSL. NEO works closely with local authorities, social care, and commissioning bodies to ensure appropriate support is provided.

6. Ergonomics and Display Screen Equipment (DSE)

NEO takes the health risks associated with prolonged use of display screen equipment seriously, for both staff and learners.

6.1 Staff DSE and Home Working

All staff and practitioners who work from home using display screen equipment are covered by the Display Screen Equipment Regulations 1992 (as amended). NEO will: Provide guidance on safe workstation setup, including monitor positioning, seating, keyboard and mouse use, and lighting. Conduct DSE risk assessments for all staff and practitioners, reviewed annually or following any significant change in working arrangements. Provide or fund appropriate equipment where needed, including external monitors, keyboards, mice, ergonomic chairs, or footrests. Make reasonable adjustments under the Equality Act 2010 for staff with disabilities or health conditions that affect their ability to use DSE safely. Encourage staff to take regular breaks: 5–10 minutes away from the screen each hour, with micro-breaks every 20–30 minutes. Ensure staff know how to report discomfort or equipment concerns early, before problems become entrenched.

6.2 Learner Ergonomics

All learners and families receive ergonomic guidance during induction, covering screen positioning, seating, break-taking, and eye health. Staff are trained to recognise signs that a learner may be experiencing discomfort related to their setup and to raise this with the family, the named practitioner, and, if needed, the SENCo. Where a learner has SEND or a health condition that affects their ability to engage with screen-based learning, reasonable adjustments are made in consultation with the SENCo and family. The Six Cornerstones approach ensures that learning is not exclusively screen-based, with Movement and Rest embedded in daily timetables.

7. Staff DSE Self-Assessment Checklist

All staff and practitioners should complete this checklist annually and after any significant change in their working environment. Completed checklists should be returned to the Director / Head of School.

Item	Completed
My screen is at eye level and approximately arm's length away.	☐
I use an external keyboard and mouse (not just a laptop keyboard).	☐
My chair supports my back, and my feet rest flat or on a footrest.	☐
My wrists are straight and forearms roughly horizontal when typing.	☐
My screen is positioned to avoid glare from windows or lights.	☐
I take short breaks (5–10 minutes) at least once every hour.	☐
I stand or stretch at least every 20–30 minutes.	☐
I follow the 20-20-20 rule for eye health.	☐
My workspace has adequate lighting and ventilation.	☐
I keep cables and equipment organised to avoid trip hazards.	☐
I have no ongoing discomfort or pain when working.	☐
I know how to request additional equipment or adjustments.	☐
I know who to contact if I have health or safety concerns.	☐

8. Risk Assessment

Risk assessments are a central element of NEO's health and safety arrangements. They are conducted, reviewed, and updated by the Director

/ Head of School (as Health and Safety Coordinator) in consultation with relevant staff.

Area	Assessment Covers
Online learning platforms	Security settings, data protection, moderation controls, privacy configurations, accessibility features, and content filtering on Google Classroom, Google Meet, and Google Workspace.
Staff home working	DSE setup, ergonomic suitability, electrical safety, lone working, stress, and secure storage of confidential information.
Learner home environments	Addressed through pastoral observation and family liaison rather than formal inspection. Concerns are escalated through safeguarding procedures.
Face-to-face or enrichment activities	Venue suitability, accessibility, fire safety, first aid provision, supervision ratios, travel arrangements, and emergency procedures. Conducted before any in-person activity takes place.
Contractors and third parties	Safeguarding checks, insurance, data protection, and platform security for any external providers delivering services to learners.

All risk assessments are reviewed annually, or sooner if activities, platforms, or circumstances change. Completed risk assessments are retained for a minimum of three years.

9. First Aid

As a fully online alternative provision, NEO does not maintain on-site first aid provision during normal operations. However, the following arrangements apply: Parents, carers, and residential settings are responsible for first aid in the learner's physical environment. This is communicated during induction and in the Home-School Agreement. Where NEO organises any face-to-face or enrichment activity, a named First Aider must be present and a first aid kit must be available. This is confirmed as part of the event risk assessment. Staff and practitioners working from home are responsible for their own first aid provision. NEO provides guidance on basic home first aid supplies. If a learner becomes unwell during a live session, staff will contact the parent or carer immediately and, in an emergency, advise calling 999. The incident is logged and reported to the DSL. If a learner discloses a medical condition, allergy, or ongoing health need, this is recorded with parental consent and shared with relevant staff to ensure appropriate adjustments.

10. Fire Safety

NEO does not occupy school premises and therefore does not maintain a fire risk assessment for daily operations. However: Any physical venue used for face-to-face activities, enrichment events, or meetings must have a current fire risk assessment, clearly marked exits, functioning fire detection and alarm systems, and an emergency evacuation procedure. These are verified as part of the event risk assessment. Staff and practitioners working from home are advised to ensure they have functioning smoke alarms, a clear exit route, and awareness of their own fire safety arrangements. Fire safety considerations are included in the risk assessment for any new venue before it is used.

11. Reporting and Incident Management

All health and safety incidents, accidents, near misses, and concerns must be reported promptly, whether they occur during online sessions, staff home working, or any face-to-face activity.

11.1 Reporting Procedure

All incidents must be reported to the Director / Head of School (Health and Safety Coordinator) within 24 hours using the NEO incident reporting form. Incidents that also constitute safeguarding concerns must be reported

immediately to the DSL in accordance with the NEO Child Protection and Safeguarding Policy. Serious incidents, including those reportable under RIDDOR, are escalated immediately to the Proprietor and, where required, to the Health and Safety Executive.

11.2 Investigation and Review

All reported incidents are logged, investigated, and reviewed by the Director / Head of School. Incident data is reviewed termly by the DSL and Proprietor, with trends and patterns informing updates to risk assessments, training, and procedures. Lessons learned from incidents are shared with staff through CPD and team briefings.

12. Lone Working

All NEO staff and practitioners work remotely, which constitutes lone working. NEO recognises the associated risks and has the following arrangements in place: Regular team check-ins and scheduled meetings ensure that staff are in frequent contact with colleagues and leadership. Staff are encouraged to set clear working hours and boundaries to protect their wellbeing and avoid overwork. NEO provides access to an Employee Assistance Programme (EAP) or equivalent wellbeing support where available. Staff are advised to share their work schedule with a household member or emergency contact and to ensure their home workspace meets basic safety standards. Any staff member who feels unsafe, unwell, or isolated should contact the Director / Head of School or DSL without delay.

13. External Providers, Contractors, and Visitors

Where NEO engages external providers, guest speakers, or contractors to deliver content or services to learners online, the following apply: All external providers are subject to appropriate safeguarding checks in line with KCSIE 2026 and the NEO Child Protection and Safeguarding Policy. External providers delivering online sessions are briefed on NEO's behaviour expectations, online safety protocols, and reporting procedures. NEO verifies that any external platform or tool used by a provider meets NEO's data protection and security requirements before it is introduced to learners. For any

face-to-face activities involving external venues or providers, NEO's risk assessment and insurance requirements must be satisfied in advance.

14. Training

All staff and practitioners receive health and safety training as part of their induction and on an annual basis thereafter. Training covers: Health and safety responsibilities under this policy Safe online delivery, including platform security and moderation Ergonomics and DSE awareness for remote working Recognising health, safety, and wellbeing concerns in learners during online sessions Incident and near-miss reporting procedures The intersection of health and safety with safeguarding First aid and fire safety awareness (relevant to any face-to-face activities) Specialist training is provided where required, for example paediatric first aid for any staff supporting face-to-face enrichment activities. Training records are maintained by the Director / Head of School and reviewed annually.

15. Digital Equity and Access

NEO recognises that health and safety in online learning is closely linked to digital equity. Where a learner does not have adequate access to a suitable device, reliable internet, or an appropriate workspace, their ability to participate safely and effectively is compromised. During the admissions and induction process, NEO assesses each learner's digital access and home learning environment. Where barriers are identified, NEO works with commissioning bodies, local authorities, and families to source equipment, connectivity, or additional support. No learner is penalised or disadvantaged in their participation or assessment due to technological or environmental barriers beyond their control.

16. Monitoring and Review

This policy is reviewed annually by the Director / Head of School and approved by the Proprietor. The review includes analysis of incident data, risk assessments, staff DSE self-assessments, and any changes to legislation or regulatory guidance. Termly health and safety checks are conducted by the Director / Head of School, covering platform security, staff wellbeing, incident trends, and risk assessment currency. The policy is subject to immediate

interim review if there is a significant change in NEO's operations, a serious incident, or a change in statutory requirements. Staff, learners, and families are consulted as part of the annual review process.

Related Policies

This policy should be read alongside: NEO Child Protection and Safeguarding Policy NEO Online Safety and Acceptable Use Policy NEO Behaviour and Regulation Policy NEO SEND Policy NEO Teaching and Learning Policy NEO Data Protection, Confidentiality and Privacy Policy NEO Equal Opportunities, Equality and Diversity Policy NEO Complaints Procedure NEO Admissions Policy NEO Staff Code of Conduct (in development) NEO Home-School Agreement

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