



HEALTH AND SAFETY POLICY

APPROVED BY: TRUST BOARD

POLICY OWNER: TRUST COMPLIANCE MANAGER

DATE: OCTOBER 2024

NEXT REVIEW DATE DUE BY: SEPT 2025

Name and address of School

St Michael's Catholic School
Daws Hill Lane, High Wycombe, Bucks HP11 1PW

Signed (Executive Headteacher)

St Michael's Catholic School
Weedon Road, Aylesbury, Bucks HP19 9PG

Signed (Governor responsible for H&S)

Mrs L Baker

Overall and final responsibility for health and safety is that of:

Mr E Hooson

Day-to-day responsibility for ensuring this policy is put into practice is delegated to:

Headteacher & Local Academy Committee

Date of Adoption

See register of persons with delegated responsibilities.

October 2024

Next review (Annual)

September 25

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1. General Statement of Health and Safety:

This Health & Safety Policy is based on the fundamental elements of Health & Safety:

- **Plan** – leaders should set the direction for effective health and safety management
- **Do** – introduce management systems and practices that ensure risks are dealt with sensibly, responsibly and proportionately
- **Check** – monitoring and reporting
- **Act** – a formal management review of existing health and safety performance. Take action and report deficiencies in processes or a breach of Health & Safety. Find realistic and sensible solutions to Health & safety situations.

The Board of Directors acknowledge and accept that the **St Thomas Catholic Academies Trust** has the prime responsibility for health and safety across all schools and that Local Academy Committees within the Academy Trust and Headteachers have specific responsibilities to manage health, safety and welfare at local level. These responsibilities are laid out later in this policy.

In addition to the duties contained in this policy, the Directors, Local Academy Committee Governors and school leaders have a responsibility to:

- To support the published policies and aims of the Academy Trust;
- To promote continuous improvement in the health and safety performance; and
- To learn from the experiences of others with the overall aim of updating procedures and arrangements to meet high standards of health and safety management and risk control.

This Health and Safety Policy sets out our approach to health and safety. It explains how your employer, St Thomas Catholic Academies Trust, will manage health and safety in our Schools.

This Policy applies to all educational establishments where St Thomas Catholic Academies Trust is the employer. It is augmented by departmental health and safety arrangements, procedures and safe systems of work as deemed appropriate. The employer's legal duties are placed on St Thomas Catholic Academies Trust. In turn, through the Academy Trust's Scheme of Delegation and Accountability Matrix, certain responsibilities are placed on the Board of Directors, Local Academy Committees, Headteachers and staff.

2. St Thomas Catholic Academies Trust Health and Safety Policy aims:

- Prevent accidents and cases of work-related ill health
- Establish a culture of employee engagement in all aspects of Health and Safety, including consultation processes where appropriate.
- Maintain safe and healthy working conditions
- Manage Health & Safety risks in our workplace
- Ensure clear instructions, information and adequate training are available to ensure employees are competent to do their work
- Ensure a clear commitment to Personal Protective Equipment
- Provide and maintain safe plant and equipment
- Ensure safe handling and use of substances
- Implement emergency procedures, including evacuation in case of fire or other significant incidents
- Ensure a commitment to Review and revise this Policy whenever required, at least annually

3. Director and Local Academy Committee Governor Involvement:

In an educational establishment it is necessary for those involved in governance to be involved in the management of health and safety.

Individual Local Academy Committees and the Board of Directors may make their own specific system, but the minimum expectation is an inspection of premises by the designated Local Academy Committee Governor for Health and Safety (or a nominated alternative as appropriate) at least twice per year. Local Academy Committee Governors may also wish to include an annual detailed examination of policies, incident investigation and the vetting of risk assessments.

In general terms, the role of the Board of Directors and each Local Academy Committee is as a critical friend with a strategic eye. While every school will have its own approach, a working party of the St Thomas Catholic Academies Trust has established a role descriptor for the Local Academy Committee Governor responsible for overseeing Health and Safety and a visit form that may be used to support scrutiny activities over the course of the year.

4. Director duties:

The Directors of the St Thomas Catholic Academies Trust will:

- Ensure this and associated policies are updated in line with changes in legislation / best practice and reviewed at least annually
- Ensure adequate funds are reserved at each school to meet annual maintenance costs not covered by School Condition Allowance or Devolved Formula Capital
- Ensure there is quality oversight of building and plant maintenance across the Academy Trust through the 5 Year Strategic Maintenance Plan
- Ensure there is quality Health and Safety support in place for all schools
- Ensure there is a quality process for reporting on all aspects of Health, Safety and Compliance
- Ensure there is an independent audit of general Health and Safety at least every 3 years as required through the Academy Trust Handbook, with further independent audit commissioned for high-risk areas (asbestos, legionella, fire); and
- Ensure the recommendations from audit outcomes are shared and implemented as appropriate.
- Ensure each school (Headteacher and Local Academy Committee) receives a detailed Health and Safety Report from the Trust Compliance Manager each year.
- Ensure adequate training is in place for both Directors and LAC Governors

5. Local Academy Committee duties:

Local Academy Committee Governors will:

- Formally adopt this policy and any revisions each year
- Annually, conduct at least one visit to the school to inspect evidence of compliance checks, site walks, and other health and safety records and carry out spot checks on this data as required to assure the governing body that the site is a safe and well-maintained place for all.
- Meet with the Trust Compliance Manager to go through, health and safety reports, audits and other professional advice, including any HSE or regulatory notices reporting outcomes from this meeting back to the LAC.
- To consider all matters of equality relating to the condition of the site.
- Provide a summary of the key matters discussed and any significant risks or concerns to the LAC
- Attend training relating to this role where provided.

6. Chief Operations Officer and Trust Compliance Manager Duties:

It is the responsibility of the Chief Operations Officer and Trust Compliance Manager, together with school-based staff and Trust Premises Managers, to provide the support necessary for there to be full compliance with all Health and Safety requirements. While it remains the legal responsibility of Headteachers to be sure that all matters of Health and Safety are being addressed in full, it is the duty of other staff to carry out the work that results in that compliance.

The Chief Operations Officer and Trust Compliance Manager will:

- Update this policy annually and ensure all related policies are updated to reflect changes legislation / best practice
- Provide a 5-year Trust Maintenance Plan ensuring:
 - a progressive, innovative, and safe learning environment to enhance student instruction and performance.
 - the most effective, best value maintenance solutions possible.
 - the use of the most effective technology to manage aspects of the facility to lower unnecessary expenses.
- Establish, manage and monitor standards, processes, communications, training and systems to ensure all responsibilities associated with Health and Safety within the Academy Trust are adhered to.
- Provide an audit report annually for each school in the Academy Trust
- Co-ordinating health and safety arrangements, carrying out continuous programmes of audits and checks, ensuring that the requirements of the establishment's health and safety standards are being met, reporting on standards and recommending provision of such additional facilities and procedures, including financial provision; Embed a quality system for reporting on all aspects of Health, Safety and Compliance
- Lead on the implementation of Risk Assessment and to manage the risks faced by our schools effectively
- Support and advise the Board of Directors and other stakeholders on all aspects with regards to Health, Safety and Compliance, helping them to meet their statutory obligations

7. Headteacher:

The Headteacher is responsible, through appropriate line management, for ensuring that the General Policy Statement on Health & Safety is implemented, and that adequate advice on health, safety and welfare matters is made available to all persons affected by this policy.

The Headteacher, as Local Health and Safety Coordinator, must ensure that guidance, codes of practice and other advice from the Academy Trust are implemented. The Board of Directors and Local Academy Committee must ensure that the Headteacher is assisted in implementing this Policy, advice and guidance of the Academy Trust and fulfils its own responsibilities for health, safety and welfare of all those who may be affected by the way the establishment is managed. This duty extends to ensuring that:

- Meeting the relevant requirements of all current legislation including the Health & Safety at Work Act 1974 and the Management of Health & Safety at Work Regulations 1999;
- Delegating certain staff with responsibility for specific duties within the establishment's health and safety management framework;
- Appointing responsible persons to co-ordinate the actions of staff and pupils in the event of a fire;
- Maintaining the school and the whole of the site in a condition that is safe and without risks to health, and providing and maintaining means of access and egress that are without such risks;

- Providing and maintaining a working environment for employees that is, without risks to health, and is adequate as regards facilities and arrangements for their welfare at work;
- Providing such information, instruction, training and supervision as is necessary to ensure, so far as is reasonably practical, the health and safety at work of all employees of the establishment;
- Providing and maintaining plant and systems of work that are, as far as is reasonably practicable, safe and without risk to health;
- Arranging and ensuring, as far as is reasonably practicable, safe working systems for handling, storage and transport of articles and substances;
- Arranging and ensuring, as far as is reasonably practicable, safe working systems for managing the movement and transport of pupils who may have particular physical and/or learning disabilities;
- Consultation with staff on all health and safety issues through the establishment of a Health and Safety Committee who will meet at least 3 times a year;
- Appointing a person(s), or as the case may be, making full use of the services of the person(s) competent to assist and advise on matters relating to statutory obligations under health and safety legislation as required by the provision of regulation (6) of the Management of Health and Safety at Work Regulations 1999
- Taking responsibility for conforming to the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR) legislation;
- Ensuring that suitable arrangements are in force and adequate equipment made available for dealing with emergencies (e.g. fire) and that sufficient persons responsible for evacuation of the premises in the event of such an emergency have been identified and made known to all other staff and pupils;
- Ensuring that all accidents, near misses and dangerous occurrences are fully investigated and that action is taken to eliminate the cause, as so far as is reasonably practicable;
- Liaison with the Health and Safety Executive, local authorities, Fire Service and any other statutory bodies as appropriate.
- Ensuring that staff with responsibility for a department, or building will maintain good health and safety practices in these areas, and ensure that all employees under their supervision are properly supervised and trained, having regard to the hazards of the jobs involved;
- Ensuring that staff co-operate with the Headteacher and Local Academy Committee members to achieve a healthy and safe work place, and take reasonable care of themselves and others who may be affected by their acts or omissions at work, properly using the procedures and facilities provided for their health and safety at work, and refraining from wilful misuse in the interests of health, safety and welfare;
- Ensuring that all employees of the Academy Trust do not impair the well-being of any employee, or any other person including clients, contractors, visitors, volunteers and any member of the public who may be affected by the conduct of its work.
- Ensuring that the Health & Safety Policy and subsequent revisions are drawn to the attention of all existing and new employees and establishing the most effective means of achieving this objective with the assistance of all levels of management;
- Ensuring that the Health & Safety Policy will be reviewed annually, or more frequently if required by changing circumstances;
- Ensuring that effective arrangements exist for consultation with all employees on health and safety matters.

8. Staff: Your responsibility:

All Staff should have regard to their own health and safety and that of others including pupils, visitors and colleagues. They should communicate any concerns to the appropriate person or to the Headteacher so that hazards can be dealt with quickly.

Health and safety duties form part of the job of every employee. The level of duty is directly related to the level of the post in the local Academy Trust School and follows the overall management structure of the Academy Trust. For example, a Head of department or subject coordinator therefore has an implied higher level of responsibility than a basic grade teacher, even if the H&S policy doesn't provide specific detail. Job descriptions do not have to be altered to reflect the duties for health and safety commensurate with the grade of the post.

9. St Thomas Catholic Academies Trust – Who to contact:

As the employer the Board of Directors has overall responsibility for Health and Safety.

The COO (Chief Operations Officer) has responsibility for day-to-day management of specific health and safety issues and is known as the Responsible Person.

At a local level, duties and responsibilities have been delegated as detailed below:

- It is the Head Teacher & Local Academy Committees' duty to delegate the responsibility for specific health & safety duties to certain members of staff.
- The Head Teacher & Local Academy Committee members must satisfy themselves that these posts are filled with 'competent' people. The definition of a competent person is 'a person with sufficient training, experience, knowledge and other qualities to fulfil a general or specific function'. The Board of Directors employs a competent person who holds the NEBOSH Diploma or certificate qualification and keeps up to date with current and upcoming legislation.
- Anyone, who is involved in any operation that is inherently hazardous, including supervision and training, must be competent to perform that work safely and without undue risk to themselves or others.

Contractors, Consultants, Advisers and Trades people are required to prove their competency to carry out duties or advise in their specialised field.

The following record is a list of all persons, deemed competent by the COO, with specific delegated responsibilities within the establishment:

| Position and Responsibility | Name |
|--|---|
| Trust Senior Management (All Academy Trust Schools) Estates, IT and Operations - Leadership team ➤ The Chief Operations Officer is responsible for the quality of the support that is provided to schools to develop their estate and IT provision. They provide support to Headteachers, Area Estate Managers and Area IT Managers in delivering a great service across our family of schools. | Clark Campbell, Chief Operations Officer ccampbell@stcat.co.uk 01582 361620 NCRQ Qualification IOSH Qualification |
| Trust Compliance Manager (All Academy Trust Schools) Health & Safety/Compliance ➤ The Trust Compliance Manager ensures all schools are working to the highest possible safety standards. The Directors of the Trust have placed compliance and safety at the top of our agenda. The Trust Compliance Manager will provide direct practical support to all schools across the Trust ensuring that scrutiny through an independent audit team always finds the best practice in all schools. The Trust Compliance Manager not only identifies where there are issues, they fix them with the school-based teams. | Jen Matthews. Trust Compliance Manager, jmatthews@stcat.co.uk 01582 361 631 NEBOSH Certificate Qualification Fire Risk Assessor Qualification IOSH Qualification |

| | |
|---|---|
| <p>Trust Premises Managers</p> <p>Premises</p> <ul style="list-style-type: none"> ➤ Premises Managers are responsible for the immediate oversight and line management of site agents across given areas. Working closely with the Trust Compliance Manager and reporting to the Chief Operations Officer, the Trust Estates Manager ensures site teams work effectively to an agreed programme of works that meet the needs of individual schools under the direction of each Headteacher. ➤ Premises Managers fulfil all the functions with respect to the development, oversight and implementation of key building and maintenance projects across the Academy Trust. They report directly to Headteachers to agree the programme of works and are supported in their work by both the Chief Operations Officer and the Trust Compliance Manager who add capacity to every project across our Trust. | <p>Kevin Eaglestone keaglestone@stcat.co.uk 01582 361 632 St Vincents, St Marys, St Margarets of Scotland, St Martin de Porres, Sacred Heart</p> <p>Cardinal Newman High School Senior Site Agent - Beri Hoxha (no line management duties) bhoxha@cardinalnewmanschool.net</p> <p>St Michaels School Senior Site Agent - Nikki Day nday@stmichaelscs.org</p> <p>St Joseph's High Premises – Kelly Riddles k.riddles@st-josephs.slough.sch.uk</p> <p>Slough/Bucks Schools – To be appointed St Anthonys, St Ethelberts, Holy Family, St Edwards, St Joseph's Infants, Our Ladys, St Peters, St Louis</p> |
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10. Delegated Responsibilities:

- The person(s) appointed as competent by the Headteacher & the Local Academy Committee of the Academy Trust School, to advise on health and safety, shall assist in the monitoring and review of procedures and policy as required. The person(s) will also be responsible for ensuring that everybody at the establishment is kept fully up to date with changes in legislation, working practices and other issues in relation to health and safety within the establishment.
- The person(s) responsible for coordinating First-Aid, will ensure that provisions conform to the Health & Safety (First Aid) Regulations 1981 (published 2013 – reissued with minor amendments in 2018 and 2024) [174.pdf \(hse.gov.uk\)](#).
- The member of staff with designated responsibility for each area will ensure that, where applicable, all statutory notices are displayed and the relevant registers kept up to date and available for inspection. Where required individual areas will have additional Health & Safety Risk Assessments to take account of particular circumstances e.g. Physical Education, Design & Technology and Science.
- Members of staff with a specific responsibility, such as for site maintenance, or medication will be responsible for maintaining good health & safety practices in these areas and for ensuring that all staff working within their area of responsibility are properly trained, having regard to the hazards of the activities involved and for advising the Headteacher & Local Academy Committee members of any subsequent specialist requirements for the health and safety of staff or pupils.
- Line managers and delegated persons are responsible for keeping themselves and all members of their team up to date with any changes to working methods or procedures pertaining to this policy and any associated documentation.
- Staff will ensure that all areas under their supervision or control are kept in a clean and tidy manner and that any articles or substances therein are properly stored, clearly labelled and used in a manner not likely to result in harm.
- All staff will be responsible for ensuring that all accidents, incidents, near misses, dangerous occurrences, injuries and instances of violence are reported.
- All staff shall familiarise themselves with the contents of this Policy and any associated documentation pertaining to their activities, and at all times comply with all requirements contained therein. They shall comply with any safety instructions from their line manager. They must wear any protective clothing and other equipment, or devices supplied not wilfully misuse or abuse such equipment or devices and report any defects, or other safety hazards encountered.

All staff, volunteers and students who are required to operate or use vehicles, plant, machinery or equipment must receive adequate training **and written authorisation** as appropriate. In the case of vehicle drivers, the appropriate license must be held, and their authorisation to drive is approved by the

Headteacher.

| Delegated responsibility for: | Job title, Person responsible, contact details (phone & email) |
|--|---|
| Governor with Health & safety responsibilities | Mr Elliot Hooson |
| Communication and information management | Mr A Palmer (Aylesbury) Ms R Morgans (HW Secondary) Mrs D Collins (HW Primary) |
| Local H&S System & Policy review | Jen Matthews. Trust Compliance Manager, jmatthews@stcat.co.uk 01582 361 631 |
| Critical Incident Management | Mrs L Baker in conjunction with the Head of Campus |
| Incident/Accident/Near Miss/Dangerous Occurrence reporting/investigation including RIDDOR (Reporting of Injuries, Diseases and Dangerous | Jen Matthews. Trust Compliance Manager, jmatthews@stcat.co.uk 01582 361 631 |
| 'Responsible Person' for fire, legionella, asbestos | Mrs T Wiggins, Director of Business Services in conjunction with Head of Campus |
| H&S Training | All Staff |
| Programmed updating training (National College) | HR Lead |
| Personal safety procedures | Site Specific Senior Site Assistant |
| Site maintenance Site Agents | All Site Agents Site Agents are employed to maintain a clean, safe and secure school premises, which includes buildings and grounds. They carry out site compliance ensuring Fire, Legionella and Asbestos checks are carried out together with other safety checks. They carry out routine maintenance, portage, and minor repairs. They should be a model for promoting health and safety around the school |
| Planned checks Procedures/Premises/Equipment | All Site Agents Kevin Eaglestone keaglestone@stcat.co.uk 01582 361 632 St Vincents, St Marys, St Margarets of Scotland, St Martin de Porres, Sacred Heart |
| Locally organised premises maintenance, repair and improvement | Cardinal Newman High School Senior Site Assistant - Beri Hoxha (no line management duties) bhoxha@cardinalnewmanschool.net |
| Premises Security and Visitor Management | St Michael's Catholic School High Wycombe Senior Site Agent - Nikki Day nday@stmichaelscs.org |
| Contractors on site | St Michael's Catholic School Aylesbury Senior Site Assistant Mr Paul Tomlinson ptomlinson@stmichaelscs.org |
| Cleaning | St Joseph's High Premises – Kelly Riddles k.riddles@st-josephs.slough.sch.uk |

| Delegated responsibility for: | Job title, Person responsible, contact details (phone & email) |
|---|--|
| Vehicles owned by Trust | Slough/Bucks Schools – To be appointed St Anthony's, St Ethelberts, Holy Family, St Edwards, St Joseph's Infants, Our Ladys, St Peters, St Louis |
| Risk assessments for premises/job roles/pregnant staff | Pregnant staff: Headteacher at Individual Campus Other Risk Assessments: Jen Matthews. Trust Compliance Manager, jmatthews@stcat.co.uk 01582 361 631 |
| Emergency Evacuation | Headteacher at Individual Campus in conjunction with Director of Business Services |
| Infection Control | Headteacher at Individual Campus in conjunction with Director of Business Services |
| Educational trip and activity risk assessments | Bucks LA, Headteacher of individual campus and Visit Leader |
| Fire procedures including personal emergency evacuation plans | Headteacher of Individual Campus in conjunction with Director of Business Services, Medical Officer and Site Assistants |
| First Aid Staff (training and equipment) & Medication | Medical Officer – Site Specific |
| Vehicle control and pedestrian safety | Headteacher of Individual Campus in conjunction with Director of Business Services, Medical Officer and Site Assistants |
| Educational visits coordinator (EVC) | Mrs D Collins HW Primary, Mrs N Marshall HW Secondary, Ms J Thompkins Aylesbury Secondary |
| Stress and Wellbeing | Headteacher of Individual Campus |
| Vehicles owned by Trust | All Site Agents |
| Child Protection Co-ordinator | DSL's Mrs D Collins, Mrs R Morgans, Mrs H Austin |
| Supporting pupils with medical | Medical Officer |
| Outside lettings | All lettings overseen by Active in the Community Policy, Application, Risk assessments and Method Statements and Public Liability Insurance and other Trust related documents: Jen Matthews. Trust Compliance Manager, jmatthews@stcat.co.uk 01582 361 631 |
| After school and Holiday clubs and activities (not Lettings) | Hi5 Wrap Around Care Mrs S Iqbal Owner siaka786@outlook.com |
| Catering Food Safety | Innovate Catering Services |
| COSHH | Prestidge Cleaning, Innovate Services, Head of Department and Site Assistants |
| Behaviour Management and Bullying | Headteacher to Individual Campus |
| Significant Building works | Clark Campbell, Chief Operations Officer ccampbell@stcat.co.uk 01582 361620 |
| Personal Protective Equipment (PPE) | Site Assistants |
| Safeguarding | DSL's Mrs D Collins, Mrs R Morgans, Mrs H Austin |

| Delegated responsibility for: | Job title, Person responsible, contact details (phone & email) |
|-------------------------------|---|
| Severe Weather | Jen Matthews. Trust Compliance Manager, jmatthews@stcat.co.uk 01582 361 631 |
| Noise and Vibration | Jen Matthews. Trust Compliance Manager, jmatthews@stcat.co.uk 01582 361 631 |
| Working at Height | Jen Matthews. Trust Compliance Manager, jmatthews@stcat.co.uk 01582 361 631 |
| Manual Handling | Jen Matthews. Trust Compliance Manager, jmatthews@stcat.co.uk 01582 361 631 |
| Other (specify) | |

11. Risk Assessments:

The Academy Trust is required by law to protect employees, and others, from harm. Under the Management of Health and Safety at Work Regulations 1999, the minimum the Academy Trust must do is:

- Identify what could cause injury or illness in your business (hazards)
- Decide how likely it is that someone could be harmed and how seriously (the risk)
- Act to eliminate the hazard, or if this isn't possible, control the risk

Assessing risk is just one part of the overall process used to control risks in your workplace.

The Academy Trust have a central record of Risk Assessments for all activities in a School environment. All schools have access to this central record.

12. Review and evaluation:


The Board of Directors will regularly monitor and review this Health and Safety Policies to ensure they are reducing risks. As part of this monitoring, the Board of Directors should investigate incidents to ensure that:

- they are taking appropriate corrective action
- they are sharing learning
- necessary improvements are put in place

Where there is a health and safety incident at the school, the competent person and others with health and safety responsibilities, should assess the effectiveness of the school's procedures and its response. They should make necessary changes to policies and procedures.

13. This Health & Safety Policy must be read in conjunction with the following Procedures, templates and related documents:

| | | |
|---|---|---|
| Trust First Aid Procedure | Trust Managing Medication Procedure | Food Allergy Procedure & Processes |
| Asthma Procedure | Intimate Care Procedures | Supporting Children with Medical Needs Procedure |
| Trust Incident/Accident Report Procedure | Trust Managing work related stress Procedure | Trust Display Screen Equipment Procedure |
| Trust Manual Handling Procedure | Trust Noise Procedure | Trust Vibration Procedure |
| Trust Legionella Management Plan | Trust Exams Fire/Bomb/Lockdown Procedure and Lockdown checklist | Trust Fire Management Plan |
| Trust Evacuation Plan (PEEP) Guidance and Peep | Trust Asbestos Management Procedure | Trust Asbestos authorising procedure |
| Trust Asbestos Permit to Work | Trust Working at Height Procedure | Trust working at Height Permit |
| Trust Lone working Procedure | Trust Risk Assessments | Trust COSHH Procedure |
| COSHH Risk Assessment templates | Trust Lettings Procedure | Trust Vehicle Segregation Procedure (segregation control and pedestrian safety) |
| Trust Permission to Works Procedure (Contractors/Site Staff controlled works) | Trust Permit to Work | Trust Hot Works Permit |



| | | |
|---------------------------|---------------------------|--------------------------|
| Events and Show | Trust Health Surveillance | Trust Lightning Guidance |
| Work Experience Procedure | | |

This document must be made available to all staff within the Trust. It is not necessary to provide a copy to each person though a copy must be provided if requested. It is generally sufficient to make the document readily available to ALL staff.