

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

Signed (Headteacher)

Signed (Governor responsible for H&S)

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

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

Date of Adoption

Next review (Annual)

Headteacher & Local Academy Committee

See register of persons with delegated responsibilities.

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:
 - o a progressive, innovative, and safe learning environment to enhance student instruction and performance.
 - o 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, imatthews@stcat.co.uk 01582 361 631 NEBOSH Certificate Qualification Fire Risk Assessor Qualification IOSH Qualification

Trust Premises Managers

Premises

- > 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.

Kevin Eaglestone

keaglestone@stcat.co.uk

01582 361 632

St Vincents, St Marys, St Margarets of Scotland, St Martin de Porres, Sacred Heart

Cardinal Newman High School

Senior Site Agent - Beri Hoxha (no line management duties)

bhoxha@cardinalnewmanschool.net

St Michaels School

Senior Site Agent - Nikki Day

nday@stmichaelscs.org

St Joseph's High

Premises - Kelly Riddles

k.riddles@st-josephs.slough.sch.uk

Slough/Bucks Schools -

To be appointed

St Anthonys, St Ethelberts, Holy Family, St Edwards, St Joseph's Infants, Our Ladys, St Peters, St Louis

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) I74.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 Communication and information management	Mark Haines mhaines@olschesham.co.uk 01494 726 390 Mark Holdsworth mholdsworth@olschesham.co.uk 01494 726 390	
Local H&S System & Policy review	Jen Matthews. Trust Compliance Manager, imatthews@stcat.co.uk 01582 361 631	
Critical Incident Management	Mark Holdsworth mholdsworth@olschesham.co.uk 01494 726 390	
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,	Mark Holdsworth	
legionella, asbestos	mholdsworth@olschesham.co.uk 01494 726 390	
H&S Training	Mark Holdsworth mholdsworth@olschesham.co.uk 01494 726 390 Overall training responsibility may be allocated to a number of people. Induction training can be a routine line management responsibility, continuous professional development and technical training may be coordinated separately. What is important is that an annual training needs analysis is carried out to ensure that requirements are identified and met within a reasonable	
Programmed updating training	Mark Holdsworth	
(National College)	mholdsworth@olschesham.co.uk 01494 726 390	
Personal safety procedures	Mark Holdsworth mholdsworth@olschesham.co.uk 01494 726 390	
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. The carry out site compliance ensuring Fire, Legionella and Asbestos checks are carried out together with other safety checks. They carry out routine maintenance, porterage, and minor repairs. They should be a model for promoting health and safety around the school	
Planned checks	All Site Agents	
Procedures/Premises/Equipment	Kevin Eaglestone keaglestone@stcat.co.uk	
Locally organised premises	01582 361 632	
maintenance, repair and improvement	St Vincents, St Marys, St Margarets of Scotland, St Martin de Porres, Sacred Heart Cardinal Newman High School Senior Site Agent - Beri Hoxha (no line management duties)	
Premises Security and Visitor Management	bhoxha@cardinalnewmanschool.net St Michaels School Senior Site Agent - Nikki Day	
Contractors on site	nday@stmichaelscs.org St Joseph's High	
Cleaning	Premises – Kelly Riddles k.riddles@st-josephs.slough.sch.uk Slough/Bucks Schools – To be appointed St Anthonys, St Ethelberts, Holy Family, St Edwards, St Joseph's Infants, Our Ladys, St Peters, St Louis	
Vehicles owned by Trust		

Delegated responsibility for:	Job title, Person responsible, contact details (phone & email)
Risk assessments for premises/job roles/pregnant staff	Mark Holdsworth mholdsworth@olschesham.co.uk Other Risk Assessments: Jon Matthews Trust Compliance Manager imatthews@steat.co.uk
Emergency Evacuation	Jen Matthews. Trust Compliance Manager, jmatthews@stcat.co.uk Mark Holdsworth mholdsworth@olschesham.co.uk 01494 726 390
- ,	
Infection Control	Mark Holdsworth mholdsworth@olschesham.co.uk 01494 726 390
Educational trip and activity risk assessments	Mark Holdsworth mholdsworth@olschesham.co.uk 01494 726 390
Fire procedures including personal emergency evacuation plans	Mark Holdsworth mholdsworth@olschesham.co.uk 01494 726 390
First Aid Staff (training and equipment) & Medication	Linda Mansfield (Office Manager) office@olschesham.co.uk 01494 726 390
Vehicle control and pedestrian safety	Mark Holdsworth mholdsworth@olschesham.co.uk 01494 726 390
Educational visits coordinator (EVC)	Linda Mansfield (Office Manager) office@olschesham.co.uk 01494 726 390
Stress and Wellbeing	Clare Cid-Fuentes 01494 726 390 ccidfuentes@olschesham.co.uk
Vehicles owned by Trust	All Site Agents
Child Protection Co-ordinator	Mark Holdsworth mholdsworth@olschesham.co.uk 01494 726 390
Supporting pupils with medical	Linda Mansfield (Office Manager) office@olschesham.co.uk 01494
Outside lettings	Linda Mansfield (Office Manager) office@olschesham.co.uk 01494 726 390
	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
After school and Holiday clubs and activities (not Lettings)	Mark Holdsworth mholdsworth@olschesham.co.uk 01494 726 390
Catering Food Safety	Jane Burke jburke@olschesham.co.uk 01494 726 390
COSHH	Mark Holdsworth mholdsworth@olschesham.co.uk 01494 726 390
Behaviour Management and Bullying	Mark Holdsworth mholdsworth@olschesham.co.uk 01494 726 390
Significant Building works	Clark Campbell, Chief Operations Officer ccampbell@stcat.co.uk 01582 361620
Personal Protective Equipment (PPE)	Mark Holdsworth mholdsworth@olschesham.co.uk 01494 726 390
Safeguarding	Mark Holdsworth mholdsworth@olschesham.co.uk 01494 726 390
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

Delegated responsibility for:	Job title, Person responsible, contact details (phone & email)
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	Trust Managing work related stress	Trust Display Screen Equipment Procedure
Procedure	Procedure	
Trust Manual Handling Procedure	Trust Noise Procedure	Trust Vibration Procedure
Trust Legionella Management Plan	Trust Exams Fire/Bomb/Lockdown	Trust Fire Management Plan
	Procedure and Lockdown checklist	
Trust Evacuation Plan (PEEP)	Trust Asbestos Management	Trust Asbestos authorising procedure
Guidance and Peep	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	Trust Permit to Work	Trust Hot Works Permit
Procedure (Contractors/Site Staff		
controlled works)		
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.