



Physical Education

Compliance Code

Reviewed: December 2023

Contents

1.0 Introduction	3
2.0 Purpose of Document	3
3.0 Responsibilities	3
3.1 Delegated Responsibilities	3
4.0 Management Issues	3
4.1 Staff competence and Qualifications	3/4
4.2 Pupils an Class Sizes	4
4.3 Curriculum Risk Assessment	4
4.3.1 Recording Risk Assessments	4
4.3.2 Incorporating Findings of Risk Assessments into Schemes of Work	4/5
5.0 Inspection of Workplace and Workplace Equipment	5
5.1 Types of Inspection, Maintenance and Testing of Work Equipment	5
5.1.1 Level 1	5
5.1.2 Level 2	5
5.1.3 Level 3	5/6
6.0 Manual Handling and Storage of Equipment	6
6.1 Apparatus handling by Pupils	6
7.0 Emergency Procedures	6
7.1 Fire	6
7.2 First Aid	7
7.3 Incident Reporting	7
7.4 Away Fixtures	7
8.0 Supplementary Guidance	7
8.1 Footwear	7
8.1.1 Games, athletics, cross-country running	7/8
8.1.2 Indoor activities (dance, gymnastics, etc.)	8
8.2 Shin Pads	8
8.3 Personal Effects, Jewellery etc.	8
8.4 Multistage Fitness Test	9

Annex A – Level 2 guidance checklist for termly inspection

1. Introduction

This Compliance Code covers Physical Education and School Sport in High Schools associated with West Norfolk Academies Trust.

Schools should also refer to 'Safe Practice in Physical Education and School Sport', current edition, published by the Association for Physical Education (afPE) which the County Council has adopted as its standard for safe practice in PE.

2. Purpose of Document

This document is designed to bring all relevant guidance on health and safety for the subject area into one place. It will inform and support the professional judgements and practices of PE teachers and enable the management of health and safety in a standardised way in line with national best practice.

3. Responsibilities

Headteachers, where appropriate through Heads of Department, teachers, technicians and other support staff, have a responsibility to ensure that the requirements stated within this compliance code are met within their school.

The Headteacher is responsible for monitoring the implementation of the Code and for ensuring that a copy is made available to the Head of PE electronically.

The Head of PE, through discussion with the Site Manager or Trust Estates Manager, is to ensure that the control measures identified within the Site General Risk Assessment are implemented and reviewed annually for their area of responsibility. Any unforeseen hazard is to be included in the Site General Risk Assessment as and when identified along with suitable control measures.

3.1 Delegated Responsibilities

Inspection, servicing and maintenance of department equipment is delegated to the site manager who is responsible for ensuring that issues identified from servicing, inspection and testing reports is communicated to the head of department in a timely manner.

An assessment of the findings is to be conducted with mitigating control measures implemented until such time that equipment can be repaired/ replaced. Where an increased risk is identified this, along with additional control measures, is to be included in the Site General Risk Assessment.

4. Management Issues

4.1 Staff Competence and Qualifications

Teachers with responsibility for the planning and delivery of PE programmes should have completed appropriate initial and/or in-service training which cover all those aspects of activity required to be taught.

Where there are specific National Governing Body Certificates available for certain sports, teachers planning or supervising these activities should be certificated as appropriate.

In secondary schools, teachers of other subjects who have no specialist training in PE are often timetabled to teach in the PE department. This arrangement should be exceptional and

be implemented with care. These teaching staff should not take full responsibility for any aspect of physical activity where there are elements of hazard and participant risk. This will include swimming, gymnastics, athletics throwing events, contact sports and aspects of outdoor and adventurous activities.

Where establishments use the services of external coaches for lessons, after school activities, visits, etc., the relevant training standards apply and Headteachers/Heads of Department must check to ensure these are held, e.g. receive a copy of qualifications etc. together with any insurance papers required if the person is not working under the West Norfolk Academies Trust insurance cover.

4.2 Pupils and Class Sizes

Teachers must take account of the age, ability, aptitude, health and special educational needs of pupils in relation to equipment and activities. Legislation does not specify maximum pupil numbers in relation to individual teaching spaces. However, there is a relationship between the degree of hazard and the size of the teaching group in certain activities. The size of practical groups and pupil-teacher ratios should take account of the assessment of potential hazards and appropriate safety requirements.

If, in a teacher's professional judgement, the class is too large to attempt a particular activity, alternative approaches must be considered, e.g. pupil assisted teacher demonstrations, only part of the class doing the activity at any one time, or not carrying out the activity. If these alternative approaches do not provide a satisfactory solution, the Head of Department should raise the matter with the Headteacher.

Pupils should be taught about the hazards, risks and control measures within the context of their work in the PE subject area so that risk awareness forms part of their learning.

4.3 Curriculum Risk Assessment

This Compliance Code and afPE guidance indicate generic hazards and the protective and preventive measures necessary to reduce risk. However, the risk assessment must take account of the local circumstances. PE staff must consider carefully what they are doing when organising activities and lessons or when dealing with any other hazard.

4.3.1 Recording Risk Assessments

The law requires the significant findings of risk assessments to be recorded. To achieve this, the Head of Department must complete a suitable Risk Assessment that covers all aspects of the PE curriculum. For further information see WNAT Risk Assessing guidance.

General Risks such as condition of play surfaces etc will be recorded as part of the site General Risk Assessment controlled by the Site Manager.

4.3.2 Incorporating Findings of Risk Assessments into Schemes of Work

Significant hazards and their control measures should also be included in "schemes of work" as appropriate. The Head of PE must draw up a plan to ensure this is implemented and findings recorded. All staff working in PE and school sport should be made aware of these findings and be involved in their review.

Once completed, these forms must be kept locally for ease of reference. It is recommended to record Risk Assessments centrally.

5. Inspection of Workplace and Work Equipment

The inspection process consists of periodic checks of the workplace environment and the equipment contained in it. The aim of this is to ensure that the control measures put in place to protect persons from risks identified in the Site General Risk Assessment are actually working in practice.

Health and Safety law requires that work equipment is maintained in a safe condition as per the Provision and Use of Workplace Equipment Regulations (PUWER). To achieve this, equipment must be maintained, inspected and, where necessary, tested. The requirement to meet regulation requirements is the responsibility of the Site Manager who monitors the need as part of their compliance schedule.

However, department staff are also responsible for the daily inspections and reporting of faults in a timely manner with suitable control measures implemented where there is a potential increased hazard and associated risk.

5.1 Types of Inspection, Maintenance and Testing of Work Equipment

There are 3 levels of inspection, maintenance and testing of work equipment which must be carried out. These are: -

5.1.1 Level 1

A visual check by staff of equipment prior to its use on a daily (or as used) basis. This is simply a visual reassurance that the item is safe to use.

All faults are to be reported to the site manager in a timely manner using the relevant helpdesk. Any equipment found to be faulty is not to be used until remedial work is completed

5.1.2 Level 2

A more formal visual inspection which should be carried out termly. It requires checking the workplace and equipment using a checklist.

Level 2 inspections will be conducted by the WNAT Estates Manager and will consider items included in Annex A to this compliance Code. The findings will be recorded and presented at the termly H&S meetings.

5.1.3 Level 3

Formal maintenance/inspection checks carried out by competent persons such as specialist contractors or members of staff who have received adequate training.

This is scheduled by the School Site Manager as part of their role responsibility for compliance management. Service, Inspection and testing reports are to be reviewed upon receipt and recorded centrally within the school Estates Management System (EMS). All issues are to be communicated to the Head of Department and additional control measures are to be considered where there is an increased risk to H&S or the operation of the school.

The records of these inspections are extremely important and can prove to be invaluable in defending any claims for compensation made against the Trust/ School.

Contractors that maintain, service and formally inspect work equipment, such as sport equipment, may sometimes recommend upgrades or improvements to the system, citing non-compliance with legal requirements. In these circumstances' schools should ask contractors to provide details and/or a risk assessment where the outcome clearly demonstrates the need for the additional control measures that the contractor has recommended.

Schools are inherently a low risk environment and all recommendations should be considered using the cost versus risk approach. However, where there is a clear lack of legislation compliance, increased risk to H&S or impact to the operation of the school then the recommendations must be implemented.

6. Manual Handling and Storage of Equipment

Where possible manual handling tasks should be avoided or the risk of handling injury minimised by appropriate task design or the use of handling aids (e.g. trolleys). The layout of storage areas should minimise the need to stretch, reach, bend or twist the body excessively to reach frequently used or heavy items. This can be enhanced by ensuring that storage areas are kept tidy and well organised.

Note: Fire escape routes and exits should remain clear at all times.

Staff should complete a suitable manual handling awareness course with records of training maintained on their personal file.

6.1 Apparatus Handling by Pupils

It is sometimes appropriate to involve pupils in apparatus handling, e.g. in gymnastics. However, this must be carried out in such a way as to reduce risk to pupils as far as is reasonably practicable. Schools must have arrangements to enable pupils to learn how to handle equipment safely according to their age and strength.

7. Emergency Procedures

Heads of Department are responsible for preparing written emergency procedures for activities where there is a risk of serious and imminent danger to employees and/or pupils. Where employees are allocated specific tasks to perform in an emergency their role should be set out in detail.

7.1 Fire

All staff are required to complete mandatory fire safety awareness training.

Evacuation procedures should be displayed in prominent locations and practiced at termly.

Firefighting equipment is not to be used to prop doors open and is the responsibility of the Site Manager.

7.2 First Aid

Due to the high risk associated with sports activities it is highly recommended that all staff within the department complete a suitable first aid course and that procedures are in place to

request assistance when required taking into consideration the potential remote location of the lessons taking place.

First aid kits should be held and inspected by the site nominated person at regular intervals. For further information see WNAT First Aid Policy.

7.3 Incident Reporting

All incidents are to be reported using the WNAT Incident helpdesk. This will assist in determining whether follow up investigation is required or whether there is a need to report the incident to the HSE as per the Reporting of Incidents, Diseases and Dangerous Occurrence Regulations (RIDDOR).

Effective investigation and reporting can assist in alleviating potential claims made against the School / Trust.

7.4 Away Fixtures

PE staff should consider how emergency situations will be handled during away fixtures and matches/events and agree procedures that will ensure an effective response to the situation.

Consideration should also be given to travel arrangements and potential incidents during transit to and from the fixtures.

Should staff be requested to drive WNAT minibuses the head of department should ensure the individual holds the correct licence category (D1), is responsible and is aware of the procedures should an incident occur.

8. Supplementary Guidance

This section contains additional information to that which is in the afPE guide. Heads of PE should always adopt afPE guidance but also adhere to local requirements set out in this section.

8.1 Footwear

Suitable footwear must be worn on all occasions by both staff and pupils. Specific requirements are:

8.1.1 Games, athletics, cross-country running

Training shoes are acceptable in most circumstances. However, the soles must provide satisfactory grip, particularly in wet conditions. Where appropriate, studded footwear should be worn. Participation in 'everyday shoes', such as those with heels or open toes, must not be permitted under any circumstances.

Footwear must always be secured by suitable fastenings. Long, loose laces and flapping tongues present a significant hazard.

In football and Rugby related activities consideration must be given to pupils in boots/blades and those in trainers. This should form part of the on-going risk assessment undertaken by the teacher.

8.1.2 Indoor activities (dance, gymnastics, etc.)

Bare feet will enhance the quality of work considerably, thereby making it safer. If the condition of the floor does not allow bare feet, then soft soled plimsolls are the best alternative. During activities such as 'step aerobics', where excessive and repeated impact might be anticipated, suitable training shoes must be worn.

8.2 Shin Pads

Shin pads must be worn in all competitive matches in football. This includes five-a-side, indoor and outdoor competitive matches. Teachers should also encourage their use in practices and training to reduce the risk of injuries.

Shin pads should be worn by rugby players who play in the front row.

In hockey during match play, practices and competitive matches, pupils are strongly recommended to wear shin pads.

When matches are played under the direct control of the National Governing Body concerned, schools should adopt their guidance.

8.3 Personal Effects, Jewellery etc.

Jewellery, i.e. watches, rings, earrings, bracelets, necklaces etc. (including jewellery worn through the ears, nose, eyebrows, lips and other exposed areas of the body) should not to be worn in PE lessons. Belts with metal buckles should not be worn and long hair should be secured as appropriate to the activity. Pupils should be consistently reminded of these requirements and a check carried out to ensure compliance before activity begins.

It is important that parents are made aware of the policy of the school on the wearing of jewellery or other personal adornments by pupils. Information should be given to parents via the school prospectus outlining the school policy on this issue and on the requirements for PE. Regular reminders in School Newsletters etc. should help to ensure the success of such a policy.

When ears, etc. are newly pierced studs and rings cannot be removed for around four to six weeks while the piercing heals. In such cases afPE guidance should be followed:

- a) All personal effects should be removed
- b) If they cannot be removed, staff need to act to try to make the situation safe
- c) If the situation cannot be made safe, the pupil(s) concerned should not actively participate

Taping over ear studs is sometimes used to make the situation safe. However, the adult in charge should be confident that this strategy will be effective.

Teachers must not remove or replace earrings. They cannot be responsible for the consequences of removing or replacing earrings. Parents cannot transfer this responsibility to teachers.

8.4 Multistage Fitness Test

Some fitness tests, such as the Multistage Fitness Test ('bleep test') and the Abdominal Curl Conditioning Test are maximal, in that they require participants to exercise to exhaustion. These tests were initially designed for use with elite adult populations and are very challenging. Consequently, they are problematic to use with groups of children because:

- a) They can impose inappropriate physiological demands on developing and immature bodily systems
- b) Self-imposed and peer pressure can encourage participants to exercise beyond safe limits
- c) Screening of participants is required prior to such tests to ensure that only those with good health take part
- d) Close and continuous monitoring of participants is essential to ensure they can cope with the demands of the test

Sub-maximal tests (e.g. step tests, timed curl ups), which generally require participants to stop before becoming fatigued or exhausted, may be more appropriate for many pupils.

Level 2 guidance checklist for termly inspection

1	Fire Precautions	Yes / No	Comments / Remedial Action
	Are escape routes and fire exits clear and unobstructed		
	Are combustible materials kept away from heat sources		
	Are emergency exits and escape routes clearly marked and visible		
	Do fire exit doors open easily (i.e. not stiff /broken, or needing a key to unlock)		
	Are all fire extinguishers fully charged, operational and in-date annual servicing.		
	Are all the elements of your fire alarm system (including call points, alarms / detectors etc tested / serviced.		
2	First Aid	Yes / No	Comments / Remedial Action
	Are first aid boxes correctly and adequately stocked		
	Are First Aiders clearly identified		
3	Housekeeping	Yes / No	Comments / Remedial Action
	Are waste bins routinely emptied		
	Are floors / corridors clear of rubbish, materials and equipment		
4	Slips / Trips and Falls	Yes / No	Comments / Remedial Action
	Are floor and stair surfaces / coverings in good condition (i.e. no worn/raised edges, no broken treads on stairs)		
	Are external play surfaces in good condition		
	Are all areas free from trailing cables / wires		
	Are steps / changes in floor levels clearly marked / obvious		
	Are handrails in good condition		
	Are wet floors or spillages dealt with appropriately		
	Are floors free from loose rugs and mats, especially on shiny / slippery floor surfaces		
5	Electrical Safety	Yes /	Comments / Remedial Action

		No	
	Are there sufficient sockets to avoid the use of adapters or extension leads and overloading		
	Have portable electrical appliances been tested as required		
	Are plugs, sockets, cables, flexes in good condition		
6	Lighting	Yes / No	Comments / Remedial Action
	Is internal and external lighting sufficient		
	Are lights and diffusers clean and in working order (no missing/broken bulbs/tubes)		
7	Storage	Yes / No	Comments / Remedial Action
	Is all stored material / equipment stored safely		
	Is all shelving / racking secure		
	Is appropriate equipment available for access to any high shelving or racking		
	Are any hazardous substances correctly labelled and stored in a safe manner		
	Are all hazardous substance storage areas clearly marked as such		
8	Furniture / Equipment	Yes / No	Comments / Remedial Action
	Is all furniture / equipment safely positioned and appropriate for its usage		
	Are ladders, step stools kept secure		
	Are ladders in satisfactory condition and suitable for the tasks carried out		
	Are ladders inspected formally and records kept		
	Are records up-to-date for all equipment requiring statutory inspection (e.g. hoists, lifts, pressure vessels, gas appliances etc)		
	Are any necessary guards and protective devices in position and operating effectively		
9	Workplace Safety	Yes / No	Comments / Remedial Action
	Are any asbestos containing		

	materials (ACM) in good condition (refer to your site asbestos register for details of any ACM's on your site)		
	Are any necessary legionella checks being carried out / recorded and any remedial actions being undertaken (as detailed in the Legionella Risk Assessment for your site)		
	Where you have safety film fitted to glazing is it in good condition i.e. no cuts, slits, scratches, not bubbling, not milky in appearance and no wavy lines when viewed at 45 degree angle?		
	Is there a comfortable working temperature		
	Are toilet facilities in good working order with hot and cold water available for handwashing		
	Are main access paths kept clear of leaves / snow & ice		
	Are access paths in good condition		
10	Incidents	Yes / No	Comments / Remedial Action
	Are all staff aware of how to report an incident?		