



**Holy  
Family  
Catholic**  
Multi  
Academy  
Trust

# Health & Safety Policy

**2021**

<b>Date of approval by directors:</b>	<b>23rd March 2021</b>
<b>Next Review Due:</b>	<b>January 2022</b>
<b>Revision Number:</b>	<b>1</b>

## Statement of Intent

Holy Family Catholic Multi Academy Trust recognises that people are our key resource and therefore fully accepts its responsibilities as an employer with regards to its Health, Safety and Well-being of its employees, pupils within our care, visitors to the premises and others who could be affected by our undertakings.

Holy Family Catholic Multi Academy Trust understands its responsibilities under the Health and Safety at Work Act 1974 (HASAWA) and that the effective management of Health and Safety plays an important role in our overall performance as an educational establishment by the reduction in injuries, ill health, protecting the environment and by the avoidance of unnecessary losses and liabilities.

Through this Policy Statement of Intent and the implementation of health and safety arrangements, Principals and Heads of Schools of our academies will ensure that they are meeting the policy aims and objectives and will actively strive for continual health and safety improvements by working in consultation with staff and other partners.

This policy will be reviewed as it is deemed appropriate, but no less frequently than every 12 months by the directors. The policy will be promoted and implemented within each academy school.

Each academy under the Holy Family Catholic Multi Academy Trust will ensure that a local Health and Safety Policy is implemented and communicated to all staff.

### Our aims are to:

- Maintain control of health and safety risks arising from our activities
- Consult with all staff on matters affecting their health, safety & welfare
- Provide and maintain safe plant and equipment
- Ensure safe handling, storage and use of substances
- Provide appropriate information, instruction and supervision for staff/students/visitors
- Ensure staff are suitably trained and competent to do their work safely
- Continually develop a safety culture to remove or reduce the possibility of accidents, injuries and ill health
- Maintain a safe and healthy working environment ensuring the welfare of all persons
- Assess risks, record significant findings and monitor safety arrangements
- Review and revise safety policies & procedures periodically and when circumstances may introduce a requirement to amend or improve arrangements

Whilst day to day management of health and safety is delegated to individual academies, the ultimate and overall responsibility for ensuring a safe and healthy environment lies with the Holy Family Catholic Multi Academy Board of Trustees.

**Name:** Andy Moor  
**Position:** CEO

**Signed:** Andy Moor  
**Date:** 23.3.21

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## 1 ORGANISATION

### 1.1 The Duties of the Employing Body

1.1.1 To produce and regularly review the Health & Safety Policy for the academy. This policy will reflect the requirements of the Health and Safety at Work etc. Act 1974 by outlining arrangements to ensure, so far as is reasonably practicable, the health, safety and wellbeing of staff, students and others affected by the organisation

1.1.2 To monitor both compliance with, as well as the effectiveness of, this policy

1.1.3 To provide adequate resources to meet the academy's legal responsibilities as well as compliance with this policy

1.1.4 To assist the employing body in discharging its legal obligations, the academy has appointed the Health, Safety & Wellbeing Service as its

1.1.5 Appoint a 'competent person' as defined by the Management of Health and Safety at Work Regulations 1999

1.1.6 The specific arrangements adopted will be guided by the Health, Safety & Wellbeing Service's Health & Safety Guidance Notes for Academies.

### 1.2 The Duties of the Principal (or equivalent postholder, e.g. Head of School, Headteacher)

1.2.1 The Principal has day-to-day responsibility for health and safety management and will take all reasonable practicable steps to secure the health and safety of students, staff and others using the academy premises or participating in academy sponsored activities. In particular, the Principal will:

1.2.2 Ensure that suitable and sufficient risk assessments of work activities are undertaken, that a written record of the significant findings of these assessments is kept and that these assessments are subject to regular review

1.2.3 Co-operate with the employing body to ensure that this policy and its associated arrangements are implemented and complied with

### 1.3 The Duties of the Health and Safety Co-ordinator

The health and safety co-ordinator has the delegated task of assisting the Principal discharge their duties in relation to day-to-day health and safety management at each academy.

To do this the health and safety co-ordinator will:

- 1.3.1 co-ordinate and manage the risk assessment process for the academy
- 1.3.2 co-ordinate general workplace monitoring inspections and performance monitoring processes and report findings to the Principal and employing body
- 1.3.3 coordinate records of external inspections and maintenance to plant or facilities and ensure that remedial actions identified are either addressed without delay or brought to the attention of the employing body if funds are not available
- 1.3.4 assist with the identification of training needs and training delivery across the academy to ensure that staff are adequately instructed
- 1.3.5 collate accident and incident information and, when necessary, carry out accident and incident investigations
- 1.3.6 arrange periodic health and safety audits and liaise with the Principal and employing body in relation to findings and any associated remedial actions

1.4 The Duties of the Supervisory Staff/Managers/Subject Leaders have specific delegated tasks in relation to health & safety management within their departments/subject areas.

They must ensure that:

- 1.4.1 Risk assessments are undertaken for the work areas for which they are responsible and that identified control measures are implemented
- 1.4.2 Appropriate safe working procedures are brought to the attention of all staff via appropriate instruction and training and are enforced effectively
- 1.4.3 They take appropriate action on health, safety and welfare issues referred to them, informing the Principal or employing body of any problems they are unable to resolve within the resources available to them
- 1.4.4 They carry out regular inspections for the Principal or employing body

1.4.5 All accidents (including near misses) occurring within their area of responsibility are promptly reported and investigated

## 1.5 The Duties of all Members of Staff

Under the Health and Safety at work Act etc 1974 all employees have general health and safety responsibilities. All employees are obliged to take care of their own health and safety whilst at work along with that of others who may be affected by their actions. This also applies to volunteers who are under the control of the Academy.

Specifically, all employees have responsibility to:

- 1.5.1 Take reasonable care for the health and safety of themselves and others in undertaking their work
- 1.5.2 Comply with the academy's health and safety policy arrangements at all times
- 1.5.3 Report all accidents and incidents in line with the reporting procedure by completing an accident form in the event of any accident/near miss
- 1.5.4 Not intentionally interfere with or misuse any equipment or fittings provided in the interests of health safety and welfare
- 1.5.5 Report all defects in the condition of premises or equipment and any health and safety concerns immediately to their line manager
- 1.5.6 Ensure that they only use equipment or machinery that they are competent / have been trained to use
- 1.5.7 Make use of all necessary control measures and personal protective equipment provided for safety or health reasons.

## 1.6 Pupils

Pupils, in accordance with their age and aptitude, are expected to:

- 1.6.1 To exercise personal responsibility for the health and safety of themselves and others
- 1.6.2 To observe standards of behaviour and dress consistent with safety and/or hygiene
- 1.6.3 To observe all the health and safety rules of the academy and, in particular, the instructions of staff given in an emergency
- 1.6.4 Not wilfully misuse, neglect or interfere with facilities or equipment provided for their and others' health and safety

## 1.7 Contractors

- 1.7.1 All contractors who work on the academy premises are required to identify and control any risks arising from their activities and inform the Principal of any risk that may affect the staff, pupils and visitors.

1.7.2 All contractors must be aware of this policy and the associated emergency procedures and comply with these requirements at all times.

1.7.3 In instances where the contractor creates hazardous conditions and refuses to eliminate them or take measures to make them safe, the Principal will take such actions as are necessary to prevent staff, pupils and visitors being put at risk from injury.

#### 1.8 Staff/Union Safety Representatives

1.8.1 Staff and/or Trade Union Safety Representatives will be encouraged to take part in consultation forums in the Academies regarding Health and Safety such as Health and Safety Committees.

## 2. ARRANGEMENTS

### 2.1 Risk Assessment

2.1.1 The underlying process which informs safety management is risk assessment. Assessments of significant risks will be made with those persons responsible for the activity/area affected and the significant findings of these decisions will be recorded in writing. This will be achieved principally by amending and adopting the model risk assessments provided by through the Trust and local Health & Safety SLA providers.

2.1.2 Risk assessments are available for all staff to view in each academy and copies can be accessed centrally. Wherever possible, affected staff will be included in the risk assessment process. Staff and other affected parties will be briefed in the risk assessment findings and staff briefings.

2.1.3 Risk assessment records will be reviewed annually in the first half of the autumn term or as needed due to change. This will be identified on the model risk assessments. Guidance notes on risk assessment arrangements can be accessed in each academy.

Other arrangements in alphabetical order:

## 3. ACCIDENT/INCIDENT REPORTING

### 3.1 Accident Reporting

In accordance with the Reporting of Injuries, Diseases & Dangerous Occurrences Regulations 2013 and Jeanne Fairbrother Associates guidance the governing body and headteacher will report the following using the forms below:

#### Definitions

- An **accident** is an unplanned, unwanted event however minor that causes injury to people, damage to property or other loss.
- A **near miss** is a similar unplanned event without consequent injury or loss, but which had the potential to do so. Reporting these incidents help identify any weaknesses in operational procedures as deviations from normal good practice may only happen infrequently but could have potentially high consequences
- A **dangerous occurrence (DO)** is something that happens in connection with the work of the school and is included in the relevant schedule of the RIDDOR Regulations. A dangerous occurrence is a particular incident involving specific issues including the failure of a passenger lifts or failure of pressure systems, overhead cables or fire. Most of these will not be applicable in school but the term DO is used and that is what it refers to.
- A **lost time accident** is an accident which is not RIDDOR reportable but involves lost time from work or possibly required first aid treatment.

<ul style="list-style-type: none"> <li>● Accidents to staff, visitors, contractors and members of the public &amp; serious pupil accidents</li> <li>● Lost time accidents</li> <li>● Dangerous occurrences</li> </ul>	<a href="#">Form 001</a> Accident Report *
	<a href="#">Form 002</a> Accident Investigation *
Minor pupil accidents	<a href="#">Form 003</a> Individual minor pupil accident *
Near miss	<a href="#">Form 004</a> Near Miss*
Bumped head	<a href="#">Form 005</a> Bumped head *
	<b>Form XXXX</b> First Aid*
*Or electronic equivalent	

Copies of these forms are available from [\[insert location in school where forms are available i.e. office, Google Drive, Shared folder\]](#)

Individual pupil accident report forms ([Form 003](#)) are used to record all minor incidents to children and young people.

All accidents to staff, visitors, contractors, and members of the public & more significant accidents to pupils are reported on ([Form 001](#))



Accident statistics will be monitored for trends and a report made to the Governors/Senior Management Team/ MAT termly.

The Head teacher or their nominee will investigate accidents using [\(Form 002\)](#) and take remedial steps to avoid similar instances recurring. Faulty equipment, systems of work, plant, equipment, fittings etc. must be reported and attended to as soon as possible.

Recording non-reportable near misses [\(Form 004\)](#) help identify any weaknesses in operational procedures as deviations from normal good practice may only happen infrequently but could have potentially high consequences.

Forms [001](#), [002](#) & [004](#) must be sent to Jeanne Fairbrother Associates for advice.

### **Reporting to the Health and Safety Executive (HSE).**

In accordance with the Reporting of Injuries, Diseases & Dangerous Occurrences Regulations 2013 the Head teacher on behalf of the Governing Body will report all accidents, dangerous occurrences & over 7 day lost time incidents.

School will contact Jeanne Fairbrother Associates **immediately** for a decision if the incident is to be reported to the HSE as required by RIDDOR.

<p><b>RIDDOR (Staff)</b> Certain injuries, absence MUST be reported to the Health &amp; Safety Executive</p>	<p>Work related deaths, major injuries (Any fracture (except fingers, thumbs or toes), loss of sight, any amputation or dislocation, any injury from electric shock or electric burn), work related diseases (must have a doctor's note which confirms the diagnosis), a work-related injury which results in hospitalisation (whether for treatment or observation). <b>Must be reported within 10 days</b> Over 7-day injury category, where an employee is away from work or unable to perform their normal work duties for more than 7 consecutive days (excluding the day of the accident).</p>
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	Contact Jeanne Fairbrother Associates for further guidance
<b>RIDDOR (Non staff)</b> Where a visitor (pupils), contractor or other non-employee is injured on council premises or elsewhere and is taken from the scene to a hospital.	The guidance requires that in addition to being taken to hospital, the accident must arise 'out of or in connection' with work. The factors determining this are whether the accident was caused by the manner of conducting our undertaking e.g., supervision, safe systems of work, competence of employees or was attributable to the condition of the equipment or premises. E.g., unsafe conditions, poor condition of premises. <b>Must be reported within 10 days</b>
<b>Lost Time Accidents (Staff)</b>	Accidents which prevent the injured person from continuing their normal work for more than seven days (not including the day of the accident but including weekends and rest days). <b>Must be reported within 15 days</b>

See also:

- [TB 001](#) Accident & Investigation Toolbox Talk
- [MAT Accident Flow Chart](#)

**4. ASBESTOS**

4.1 The arrangements for the management of asbestos on individual sites are detailed in the AsbestosManagementPlan(AMP). This is located in the Asbestos Register folder held by the nominated location each Academy. Please contact the caretaker/site manager in the first instance.

4.2 The Asbestos Register will be made available to all staff and contractors prior to any work commencing on the fabric of the building or fixed equipment containing asbestos e.g. boilers. No work can commence until permission to work has been given by the authorising manager named in the AMP. The authorising manager shall ensure:

4.2.1 The AMP is reviewed annually and that any changes are approved by the employing body

4.2.2 That the Asbestos Register is consulted at the earliest possible opportunity in the planning process and that all work on

the fabric of the building or fixed equipment is approved via the completion of the relevant form

4.2.3 A visual inspection of those asbestos containing materials remaining on site is conducted and recorded in the Register according to the frequencies identified in the AMP. Any subsequent changes to asbestos containing material on site will be recorded in the Register

4.3 All parties will ensure that any damage to materials known or suspected to contain asbestos should be reported to the Premises manager at the earliest opportunity.

4.4 Staff must not undertake any work that may disturb asbestos i.e. erecting displays etc without consultation with the asbestos register/site team first.

## **5. COMMUNICATION AND TRAINING**

5.1 Further guidance and information about health & safety issues can be found in the Guidance and Briefing notes which are located in the Trust documents library.

5.2 The Health and Safety Law poster is displayed in the staffroom at each academy.

## **6. HEALTH AND SAFETY TRAINING**

6.1 All employees will be provided with:

- induction training in the requirements of this policy
- updated training in response to any significant change
- training in specific skills needed for certain activities as identified by the relevant risk assessment
- refresher training where required

6.2 Training records will be kept at each Academy and the co-ordination of health and safety training needs will take place with the central operations team. This includes a system for ensuring that refresher training is undertaken within the prescribed time limits.

6.3 Each member of staff is also responsible for drawing the relevant line manager's attention to their own personal needs for training and for not undertaking duties unless they are confident that they have the necessary competence. All employees shall undertake work tasks as instructed and trained.

## **7. CONSULTATION**

7.1 Staff are represented at each Local Governing Body. Consultation of day to day matters will be achieved through the relevant staff briefings/meetings.

7.2 Members of staff with concerns should raise them initially with their Principal or the Health & Safety Coordinator. If required, requests for external advice should then be sought from the central operations team for concerns of employees which cannot be resolved locally.

## **8. CONTRACTORS**

8.1 All contractors must report to the main office/reception area where they will be asked to sign the visitors' book and wear an identification badge. Contractors will be issued with guidance and requirements for safe practice whilst on site by the Site Team. Where necessary, contractors will also be requested to sign to confirm that they have read and understood the Asbestos Register. To ensure contractor competency.

## **9. CURRICULUM ACTIVITIES**

9.1 Risk assessments for the significant hazards within curriculum activities will be carried out by the Principal (or designated person/s on their behalf i.e. Heads of Departments etc) using if appropriate model risk assessments listed above.

## **10. FIRE AND EMERGENCIES**

10.1 The Principal is responsible for ensuring that the fire risk assessment is undertaken by a competent person. The fire risk assessment will be located in a nominated location in school and a copy retained by the Trust and will be reviewed annually. Each school will have a Fire log book which is kept at reception.

10.2 Fire and emergency evacuation procedures are detailed in the Fire Emergency Plan document. All staff will be briefed in the contents of this plan at induction and on an annual basis.

10.3 Bespoke fire evacuation procedures will be displayed around each academy.

10.4 This will be augmented by fire drills which will be undertaken termly. Evacuation procedures are also made known to all contractors / visitors.

10.5 The Principal or (nominated delegate) is responsible for ensuring that the academy's Fire Log is kept up to date.

10.6 Each academy will ensure that any persons requiring assistance in the event of an emergency will have relevant documented plans in place for each individual.

10.7 Procedures for other critical incidents and off-site emergencies are contained within the Academy's Emergency Management Plan which is located in the main office and will be reviewed annually. Emergency contact and key holder details are held in the main office of each academy and held centrally

## **11. HAZARDOUS SUBSTANCES**

11.1 Where it is consistent with the effective performance of the task in hand, every attempt will be made to choose the least harmful chemical possible.

11.2 The responsible manager shall ensure that:

- an inventory of all hazardous substances used within their area of responsibility is compiled and kept up to date
- Material Safety Data Sheets (MSDS) are obtained from the relevant supplier for all such materials
- risk assessments are conducted by the Premises Manager or competent person to identify the safe working method and appropriate emergency procedures
- all chemicals are appropriately and securely stored out of the reach of children
- all chemicals are kept in their original packaging and never decanted into unmarked containers
- appropriate training is provided to staff as identified in the individual academies training matrix.

## **12. LEGIONELLA**

12.1 A water risk assessment for each academy has been completed by an external provider. The site manager/caretaker is responsible for ensuring that the identified operational controls are being conducted and recorded in the water hygiene log book. This risk assessment will be reviewed where significant changes have occurred to the water

system. The majority of schools have regular checks and monitoring visits by a provider recommended through local Health and Safety SLA provider.

### **13. LETTINGS/SHARED USE OF PREMISES**

13.1 The employing body will ensure that the hirer/tenant has public liability insurance and will share with the hirer/tenant all relevant

13.2 The hirer/tenant will be required to provide a copy of their risk assessment where their activities present a significant hazard either to the building itself or to the safety or health of the occupants within it.

13.3 The hirer/tenant will be given a copy of the academies health and safety information/evacuation procedures and must abide by these at all times including the participation of fire drills if and when required.

### **14. LONE WORKING**

14.1 All staff should avoid lone working wherever possible by arranging for a colleague to also be on site. Where lone working is unavoidable staff should ensure that all outside doors are locked and curtains/blinds are closed when it is dark.

14.2 Fire doors must be unlocked when staff are working on the premises, e.g. out of school hours.

14.3 Anyone lone working should ensure they have access to a personal mobile phone.

14.4 When two or more people work late they should try to leave the building together.

14.5 Cars should be parked as close to the access doors as possible.

14.6 Where possible staff should let family know if they will not be home at their usual time and what time they can be expected.

14.7 Any persons identified as lone workers should have an appropriate risk assessment undertaken.

### **15. MAINTENANCE OF PLANT AND EQUIPMENT**

15.1 Regular inspection and testing of school equipment is conducted to ensure that work equipment is maintained in a safe and efficient state.

Records of such monitoring will be kept by the site manager/ caretaker.

All staff are required to report any problems found with

plant/equipment to the Principal/site team. Defective equipment will

be clearly marked and taken out of service or storing in a secure location pending repair/ disposal.

15.2 A programme for the specific statutory inspections and tests will at each academy include:

- Annual gas appliance inspection and maintenance
- Electrical installation inspection every 5 years (3 years for sports hall lettings)
- Annual Boiler Pressure Vessel

## **16. PORTABLE ELECTRICAL APPLIANCES CHECKING AND TESTING**

16.1 All staff will conduct a visual inspection of plugs, cables and electrical equipment prior to use. Defective equipment will be reported to the site manager/caretaker.

16.2 All portable items of electrical equipment will be subject to formal inspection and, where appropriate, a testing regime on an identified cycle dependent upon the level of risk associated with the particular appliance type following the approved code of practice.

16.3 Personal items of equipment should not be brought into the academy without prior authorisation and must be subjected to the same inspection process as academy-owned equipment.

## **17. MEDICATION ARRANGEMENTS**

17.1 Arrangements for medication are detailed in the separate Administration of Medicines Policy, which is reviewed annually.

17.2 Specific training will be given based on requirements i.e. EpiPen training etc.

## **18. MONITORING**

18.1 The Principal will put in place procedures to monitor compliance with the arrangements described in this policy.

18.2 A general inspection of the site will be conducted at least twice per year and be undertaken by the local H&S representative and site manager. The Trust central operations team will undertake at least an annual visit to review the site.

18.3 Other processes employed to monitor compliance with this policy and health and safety performance in general are included in the Principal's Report.

## **19. MOVING AND HANDLING (PUPILS)**

19.1 The risk assessment of significant manual handling tasks is undertaken as described in the risk assessment section above. Staff engaged in these activities will be provided with information on safe moving and handling techniques and will receive specific training where the need is identified in the risk assessment.

19.2 All moving and handling of pupils will be risk assessed by Principal/SENCO and recorded in a specific Handling Plan For The Individual Concerned. All staff Who Move And Handle Students will receive appropriate training both in the controls listed in the Handling Plan and specific training on any lifting equipment that they may be required to use.

## **20. OFF SITE VISITS**

20.1 The Academy has confirmed that each Academy may adopt the relevant Local Authority document for Outdoor Education, Visits and Off-site Activities Health & Safety Policy as its own policy. In order to support this process each Academy makes use of an online educational visits system (Evolve). In line with this policy, the Evolve Educational Visit Adviser has been engaged to endorse arrangements for higher risk activities. The Educational Visit Adviser will therefore be notified of all Category B and C visits (residential, overseas and hazardous activities).

20.2 For lower risk Category A visits the Academy's Educational Visits Co-ordinator, will check the documentation and planning of the proposed activity and initially approve the visit before referring to the Principal for final approval. For full details relating to educational visits, reference should be made to the Outdoor Education, Visits and Off-site Activities Health & Safety Policy.

## **21. PERSONAL SAFETY AND SECURITY**

21.1 The Academy believes that staff should not be expected to put themselves in danger and will not tolerate violent / threatening



behaviour to its staff. A separate specific Abusive Behaviour Policy is in place. Staff will report any such incidents in accordance with agreed Academy accident/incident reporting procedures.

21.2 Working alone will be avoided wherever possible. Work carried out unaccompanied or without immediate access to assistance will be risk assessed by the Principal (or representative) in order to identify and implement control measures. The requirement to undertake a lone working risk assessment will also extend to working alone off-site where staff conduct home visits.

21.3 Staff working outside normal school hours must obtain permission of the Principal.

## **22. ACADEMY SECURITY**

22.1 The Principal/appointed competent person is responsible for undertaking a risk assessment for site security in order to identify and implement control measures in this area.

## **23. SMOKING/DRUGS/ALCOHOL**

23.1 Smoking is not permitted anywhere across the academy estate, this includes all forms of e- cigarettes.

23.2 Drugs are not permitted on the site unless it is prescribed.

23.3 Alcohol is not permitted on the site unless during a licenced event run by staff. All events must have been cleared by the Principal/Trust.

23.4 Staff attending for work under the influence of drugs or alcohol will be subject to disciplinary procedures.

## **24. STRESS/WELL-BEING**

24.1 The Academy is committed to promoting high levels of health and well-being and recognises the importance of identifying and reducing workplace stressors through risk assessment in line with the HSE's management standards. Arrangements for responding to individual concerns and monitoring staff workloads e.g. return to work procedures following absence the school buys back occupational health support, participates appraisal management arrangements, undertakes relevant risk assessments.

## **25. WORK AT HEIGHT**

25.1 Work at height will be avoided wherever possible. Work carried out at height where a significant injury could result will be risk assessed by the relevant line manager in order to identify and implement control measures. Staff who work at height will be briefed in risk assessment findings. When working at height (including accessing storage or putting up displays) appropriate step ladders or kick stools are to be used. Staff must not climb onto chairs.

25.2 Formal training on work at height will be undertaken where the need is identified in the risk assessment process described above. It will be ensured that:

- all work at height is risk assessed and properly planned and organised
- all those involved in work at height are trained and competent to do so
- the use of access equipment is restricted to authorised users
- access equipment is regularly inspected and maintained in a safe condition
- access to fragile surfaces is properly controlled

## **26. WORK EXPERIENCE**

26.1 If an Academy hosts a work experience placement, any significant hazards within the planned work tasks will be risk assessed and findings will be communicated to the student and their parents/guardians via the student's secondary school.

26.2 A signed documented contract/job description will be in place between the academy and the work experience provider prior to any student commencing work based on the risks and limitations of any role i.e. working hours, restrictions of role (COSHH exposure etc)

26.3 This policy should be implemented within the context of the vision, aims and values of each of our academies.

26.4 Each academy within the Holy Family Catholic Multi Academy Trust collects and uses personal information about staff, pupils, parents and other individuals who come into contact with the school. This information is gathered in order to enable it to provide education and other associated functions. In addition, there may be a legal requirement to collect and use information to ensure that the school complies with its statutory obligations.