



Hollymount School

Health and Safety Policy

Issue Date	February 2021	Review Date:	January 2022
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**This policy is based Model Health & Safety Policy Produced by
the London Borough of Merton.**



Health and Safety Policy

Part 1: Statement of Intent

The Governing Body believes that effective health and safety management supports our delivery of education and services to pupils.

We consider the health and safety of pupils, employees and visitors to the school to be an integral part of what we do and will pursue continual improvement in performance through the setting of objectives and targets.

We are committed to:

- Developing and maintaining a positive Health and Safety culture with an emphasis on continuous improvement, through communication and consultation with employees and their trade union representatives.
- Providing a safe and healthy working environment.
- Ensuring safe working methods and providing safe equipment.
- Assessing and controlling the risks that arise from our work.
- Complying with and where possible exceeding statutory requirements.
- Preventing accidents and work related ill health.
- Providing effective information, instruction and training.
- Monitoring and reviewing systems and preventative measures to make sure they are effective.
- Ensuring adequate resources are made available to fulfil our health and safety responsibilities.

For these commitments to be effective, employees throughout the school must play their part in the creation of a safe and healthy working environment for all.

Name/Signature of Chair of Governors:

Date:

Name/Signature of Headteacher

Date:



Part 2: Responsibilities and Organisation

Introduction

To comply with the Governing Body's Statement of Intent the following responsibilities have been assigned:

The Governing Body

The Governing Body is responsible for ensuring that:

- a) A clear written policy statement is created which promotes suitable attitudes towards health and safety in staff and pupils.
- b) Responsibilities for health, safety and welfare are allocated to specific people and those people are informed of these responsibilities.
- c) A lead governor for health and safety is nominated.
- d) People have sufficient experience, knowledge and training to perform the tasks required of them.
- e) Clear procedures are created which assess the risk from hazards and produce safe systems of work.
- f) Sufficient funds are set aside with which to operate safe systems of work.
- g) Health and safety performance is measured.
- h) The school's health and safety policy and performance is reviewed annually.

The Headteacher

The Headteacher is responsible for the following:

- a) To be fully and visibly committed to the Governing Body's Statement of Intent for health and safety.
- b) Ensure that a clear written local health and safety policy is created.
- c) Ensure that the policy is communicated to all relevant people.
Ensure appropriate information on significant risk activities is provided to visitors and contractors.
- d) Ensure appropriate consultation arrangements are in place for staff and their Trades Union representatives.
- e) Ensure that all staff are provided with adequate information, instruction and training on health and safety issues.
- f) Arrange for risk assessments of the premises and working practices to be undertaken.
- g) Ensure safe systems of work are in place as identified from risk assessments.
- h) Ensure that suitable emergency procedures are in place.
- i) Ensure that equipment is inspected and tested to ensure it remains in a safe condition.
- j) Ensure records are kept of all relevant health and safety activities, e.g. assessments, inspections, incidents, health and safety training etc.
- k) Ensure arrangements are in place to monitor premises and health and safety performance.
- l) Ensure that all incidents are investigated and suitable remedial actions are taken.
- m) Report to the Governing Body annually on the school's health and safety performance.



Lead Governor for Health and Safety

CLlr David Williams, Chair of the Business Committee is responsible for the following:

- a) Fully and visibly committed to the Governing Body's Statement of Intent for health and safety.
- b) Scrutiny and review of health and safety performance.
- c) Providing support and challenge to the Head teacher in fulfilling their health and safety responsibilities.
- d) Ensuring that risk assessments of the premises and working practices are carried out and documented.

School Health and Safety Coordinator

Anita Jennings, School Business Manager is responsible for the following:

- a) To coordinate and manage the annual risk assessment process for the school.
- b) To coordinate performance monitoring processes.
- c) To make provision for the inspection and maintenance of work equipment.
- d) To manage the keeping of records of all health and safety activities including management of building fabric and building services in liaison with facilities management service providers and other contractors.
- e) To advise the Headteacher of situations or activities which are potentially hazardous to the health and safety of staff, pupils and visitors.
- f) To ensure that staff are adequately instructed in safety and welfare matters about their specific work place and the school generally.

Teaching, Support Staff and others holding positions of special responsibility

These individuals (e.g. Deputy/Assistant Headteachers, Phase & Subject Leaders, Business Manager, Administration & Support staff, Site Manager) assist the Headteacher named above in ensuring the day-to-day management of health and safety in accordance with this health, safety and welfare policy and all associated arrangements and procedures.

NOTE!

(i) The following responsibilities must be allocated to the appropriate member of staff and set out clearly and unambiguously in this part of the policy so it is absolutely clear who does what.

(ii) This is **NOT** an exhaustive list and additional duties and functions must be added against each individual as appropriate.

- Apply the school's Health and Safety Policy or relevant Health and Safety Code of Practice to their own department or area of work and be directly responsible to the Headteacher for the application of the health and safety procedures and arrangements; *James Hagen, Site Manager, Anita Jennings, School Business Manager, Maria Halpin, ICT Manager, Phase Leaders.*



- Carry out regular health and safety risk assessments of the activities for which they are responsible;
James Hagen, Site Manager, Anita Jennings, School Business Manager, Maria Halpin, ICT Manager, Phase Leaders, Class Teachers
- Ensuring that all staff under their line management are familiar with health and safety procedures; systems of work; codes of practice etc, for their area of work; *Sam Birnage, Headteacher, Ann Pope, Deputy Headteacher, Anita Jennings, SBM*
- Resolving health, safety and welfare problems referred to them by members of staff, and/or refer to the Headteacher any problems to which they cannot achieve a satisfactory solution within the resources available to them; *Anita Jennings, SBM, James Hagen Site Manager*
- Carry out regular inspections of their areas of responsibility to ensure that equipment, furniture and activities are safe and record these inspections where required; *SBM, Site Manager*
- Ensuring so far as is reasonably practicable, the provision of sufficient information, instruction, training and supervision to enable other employees and pupils to avoid hazards and contribute positively to their own health and safety; *Headteacher, SBM*
- Identifying appropriate health and safety training for staff under their line management and supporting them in attending this training; *Headteacher*
- Assist with ensuring that all staff receive both initial and refresher health and safety training appropriate to their job and the tasks they carry out; *SBM*
- Arrange health and safety courses to meet identified staff training needs. *SBM*
- Undertaking daily checks of the school fire and evacuation arrangements to ensure that fire exits are not blocked and that all exit mechanisms are functioning correctly; *James Hagen, Site Manager*
- Ensuring that regular workplace inspections are carried out; *Site Manager, SBM*
- Ensuring action is taken on issues arising from the safety visits carried out by the Corporate Safety Section; *Headteacher, SBM*
- Disseminating health and safety information to appropriate persons throughout the school; *Headteacher, SBM*
- Arrange for all amendments to corporate, departmental and school health and safety policies to be communicated to all school staff; *Headteacher*
- Ensuring that all staff and visitors are properly informed of the school's health and safety arrangements; *SBM*



- Ensuring that contractors, members of the public and visitors follow the school's safety procedures; *Headteacher , SBM, Site Manager*
- Ensuring that contractors working on at the school are signed in and out, work only by appointment and that all health and safety implications have been covered with the contractor before work is allowed to commence. *SBM, Site Manager*
- Ensuring equipment maintenance records are kept and maintained. *SBM, Site Manager* including:
 - Maintenance of fire alarm and fire extinguishers;
 - Maintenance of gas appliances;
 - Inspection and testing of portable electrical equipment;
 - Maintenance of hoists, lifting equipment etc.
- Ensuring that all new staff receive a copy of the school health and safety policy, and sign to the effect that they have read and understood their responsibilities. *SBM*
- **Accident / Incident Reporting and Investigation**
Ensuring that accidents and cases of work-related ill health involving employees (or non-employees and pupils where the non-employee or pupil is taken directly to hospital) is reported and investigated using the online accident reporting and investigation system in line with the Corporate Accident and Investigation procedure; *Headteacher , SBM*

Minor injuries to non-employees (i.e. pupils and visitors) will be recorded locally in the school's Incident Report book. Where first aid is given this will be reported on the First Aid Record of Treatment form.

The Incident Report book is kept in the: *School Office and the incident should be reported immediately to SBM* and the First Aid Record of Treatment forms are kept by: *First Aiders/Office Staff* at *Medical Room*

Headteacher / SBM will investigate all incidents and act on findings to prevent a recurrence.

Headteacher / SBM is responsible for reporting incidents to the Corporate Safety Section and maintaining records.

- **Consultation with Employees**

Union-appointed safety representative is *Kate Darwin*

Consultation with employees not represented by a union is provided through advice provided by *SBM*.

Communicating and consulting with staff generally on health and safety matters is carried out through a variety of channels: staff induction procedures, weekly staff briefings, e-mailed memos, documents placed on the shared network and H&S advice contained in the Staff Handbook.

- **Display Screen Equipment and Workstations**



The Headteacher and/or Maria Halpin, ICT Manager is responsible for ensuring that all designated users within the school complete the online training and workstation self-assessment form following guidance and documentation available on the Merton Intranet.

- **Educational Visits**

Educational visits, including residential visits and any school-led adventure activities, will be organised following guidance produced by the LA's Educational Visits Adviser (EVA).
Programme plans and Risk Assessments will be completed for all off-site activities.
The school's appointed Educational Visits Co-ordinator (EVC) is *Headteacher*

- **Emergency Procedures – Fire and Evacuation**

Escape routes are checked by: *James Hagen, Site Manager*, daily

Fire extinguishers are maintained and checked by: *Stand-By Fire Protection* every Year.
Fire extinguishers are checked to ensure they are in the correct positions and have not been discharged: *Site Manager, weekly*

Alarms are tested by: *Site Manager, weekly*

Emergency evacuation procedures will be tested once every term by: *HT, Site Manager*

- **Fire Safety**

A fire risk assessment will be carried out and local fire safety procedures developed for the premises by *Site Manager/SBM* following guidance and documentation available on the Merton Intranet or Fronter.

- **First Aid**

First aid box(es) are kept at: *Medical Office, Foundation Stage Classrooms, door to playground (at break/lunchtimes), four portable First Aid packs for off-site activities and 1 large pack for residentials. Small First Aid boxes for each classroom.*

The following employees are available to provide first aid:

*Trained and qualified: Mrs Tracy de Villiers, School Office
Mrs Alexandra Russell, School Office
Miss Katie Darwin, PPA teacher*

*Paediatric: Mrs Faye Kimber, Nursery teacher
Miss Tammy Draper, Reception TA
Mrs Jackie Blackmun
Mrs Luda Ciripitca*

*One day training: TeaTimers Supervisor
Plus 7 members of the support staff (see H&S training records)*



- **Food preparation and cooking lessons**

The DT coordinator for Cooking & Nutrition is responsible for monitoring Cooking & Nutrition at Hollymount Primary school. However, all staff members delivering and planning DT, including Cooking and Nutrition, are responsible to cross-reference Scientific links on planning and ensure that planning makes specific reference to risk assessments and health and safety procedures. The school's generic *Risk Assessment form for Food preparation* should be referred to and adapted as necessary to the specific activity.

- **General Risk Assessments**

General Risk Assessments will be coordinated by *Headteacher / SBM* following guidance and documentation available on the Merton Intranet and/or Fronter.

Headteacher / SBM will be responsible for ensuring all required actions and control measures are implemented.

- **Health and Safety Training:**

The members of staff named below have received or will receive health and safety training in the following areas:

- **Induction**

Health and safety induction training will be provided for all new employees and for work experience placement students by *Kelly Daffue, Assistant Head (responsible for staff induction)* following guidance and documentation provided by Learning & Development.

Strategic Health and Safety Management and Premises Management Training

Accident Reporting and Investigating *Headteacher , SBM*

Asbestos Awareness *Sam Birnage, Headteacher, Site Manager*

Critical Incident Management *Ann Pope, Deputy Headteacher*

Display Screen Equipment (workstations) *Maria Halpin, ICT Manager*

Educational Visit Co-ordinator *Keira Singfield, KS2 Leader*

First Aid – *see nominated First Aiders*

Fire Risk Assessment *Site Manager*

Food hygiene and preparation *DT Co-ordinator, Extended Services Staff Manager*



General Awareness for Staff *Site Manager*

General Awareness for Managers *Headteacher*

Introduction for Risk Assessment *Site Manager, Headteacher*

Safe Manual Handling of Static Loads *Site Manager*

Water Safety *Site Manager*

- **Primary and Secondary PE and School Sport**

Risk Management in PE and School Sport: *Alexandria Howland, PE subject Leader*

- **Outdoor Education**

Educational Visits Coordinator: *Keira Singfield, KS2 Leader*

- **Caretaking/Site Management**

School Caretakers Health and Safety Awareness:

Safe Use and Inspection of Ladders and Stepladders: *Site Manager*

- **Training Records and Training Needs Identification**

Health and safety training records are held by: *SBM*

Training needs will be identified, arranged and monitored by: *Headteacher / SBM*

- **Information and Advice**

Statutory health and Safety Law Poster is displayed in *Staffroom*

Health and safety advice is available from the Head teacher and from Corporate Safety Services on (020) 8545 3384.

- **Lead Governor for Health and Safety**

The lead governor with responsibility for health and safety is *Cllr David Williams, Chair of Business Committee*

- **Management of Asbestos**

The asbestos register and asbestos management plan is held by: *Sam Birnage* in *Headteacher's Office*

Headteacher / SBM / Site Manager is responsible for ensuring that contractors who may be working in areas where asbestos has been identified sign the register and that any changes to the register are notified to the Asbestos Compliance Officer.

- **Managing Medicines**

Prescribed medication will be administered to pupils following guidance in the school policy: *Policy for Supporting Pupils in schools with Medical Conditions*



Alexandra Russell, Admin Officer is responsible for control of administration of medicines to pupils.

- **Manual Handling**

Manual handling risk assessments will be carried out by *Site Manager*, following guidance and documentation available on the Merton Intranet or Fronter.

- **Monitoring**

Routine inspections of the premises to ensure that safe working practices are being followed will be carried out by: *SBM / Site Manager* Half-termly *and report to Business Committee termly.*

- **Occupational Health**

Access to occupational health services is via *Merton SLA: "Health Management Ltd"*

- **Review of Policy**

This policy will be reviewed annually or earlier in the light of experience, or because of operational or organisational changes or for any other reason that the policy ceases to be valid. Date of next review: *January 2020*

- **Risk Assessment of Curriculum Activities**

Relevant Heads of Department and subject teachers will carry out risk assessments for curriculum activities using curriculum Codes of Practice and following guidance and documentation available on the Merton Intranet or Fronter.

- **Safe Plant and Equipment**

Plant and equipment will be inspected, maintained and, where necessary, tested by appropriate contractors.

Routine local testing of emergency lighting, fire alarm call points, flushing of infrequently used water outlets and monthly water temperature monitoring will be carried out by *James Hagen, Site Manager*

Any problems or defects with plant and equipment should be reported to *SBM*.

- **Selection and Management of Contractors**

SBM is responsible for ensuring that contractors are selected and managed following guidance and documentation available from the Merton Intranet or Fronter.

- **School Security and Visitors**

All visitors must report to *School Reception staff* at *School Office* where they will be asked to sign the visitor's book and wear a visitors' badge.

Other arrangements to ensure the security of pupils and employees on site are overseen by : *SBM*

- **Violence to Staff**

Refer Separate school statement (appendix to Policy)



Health and Safety Responsibilities of Class Teachers

All Class teachers are required to:

- a) Exercise effective supervision of their pupils, to know the procedures for fire, first aid and other emergencies and to carry them out.
- b) Follow the particular health and safety measures to be adopted in their own teaching areas as laid down in the relevant Code of Practice, if issued, and to ensure that they are applied.
- c) Give clear oral and written safety instructions and warnings to pupils when necessary.
- d) Follow safe working procedures.
- e) Require the use of protective clothing and guards where necessary.
- f) Make recommendations to their Headteacher or Head of Department on health and safety equipment and on additions or necessary improvements to plant, tools, equipment or machinery.
- g) Integrate all relevant aspects of safety into the teaching process and, where necessary, give special lessons on health and safety in line with National Curriculum requirements for safety education.
- h) Report all accidents, defects and dangerous occurrences to their Head of Department.

Health & Safety Responsibilities of All Employees

All employees have individual legal responsibilities to take reasonable care for the health and safety of themselves and for others who may be affected by their acts or omissions. In particular, employees must:

- a) Comply with the school's health and safety policy and procedures at all times – in particular procedures for fire, first aid and other emergencies and incident investigation.
- b) Cooperate with school management in complying with relevant health and safety law.
- c) Use all work equipment and substances in accordance with instruction, training and information received.
- d) Report to their manager any hazardous situations and defects in equipment found in their work places.
- e) Report all incidents in line with the incident reporting procedure.
- f) Act in accordance with any specific health and safety training received.
- g) Inform their manager of what they consider to be shortcomings in the school's health and safety arrangements.
- h) Exercise good standards of housekeeping and cleanliness.
- i) Co-operate with appointed Union Health and Safety Representative .

Pupils

Pupils, allowing for their age and aptitude, are expected to:

- a) Exercise personal responsibility for the health and safety of themselves and others.
- b) Observe standards of dress consistent with safety and/or hygiene.
- c) Observe all the health and safety rules of the school and in particular the instructions of staff given in an emergency.
- d) Use and not wilfully misuse, neglect or interfere with things provided for their health and safety.



Health and Safety Representatives

The Headteacher and the Governing Body of *Hollymount Primary School* recognise the role of Health and Safety Representatives appointed by recognised trade unions.

Health and Safety Representatives will be allowed to investigate incidents and potential hazards, pursue employee complaints and carry out school inspections within directed time but, wherever practicable, outside teaching time.

They will also be consulted on health and safety matters affecting all staff.

They are also entitled to certain information, e.g. about incidents and to paid time off to train for and carry out their health and safety functions. However, they are not part of the management structure and do not carry out duties on behalf of the Head teacher or Governing Body.

Part 3: Arrangements and Procedures

This details the operational arrangements in place at *Hollymount Primary School* to ensure the health, safety and welfare of employees or anybody else who may come onto site e.g. pupils, students, staff, visitors, contractors etc.

It describes how *Hollymount Primary School* will meet the standards set out in the Part 1 Statement of Intent and details procedures and arrangements for controlling the risks involved in a range of site/section activities.

The Arrangements relevant to *Hollymount Primary School* are listed in the Table of Arrangements below. The table is split into two parts. The first part lists mandatory health and safety arrangements that **ALL** sites/section **MUST** have in place.

The second part lists the local operational health and safety arrangements specific to the particular area of work carried out at *Hollymount Primary School*.

The tables contain the following columns.

- Subject Heading of the Arrangement
- Name and Job Title of the person responsible for the Arrangement
- Location of the Arrangement
- Date of Issue
- Date of Review

The Arrangements and Procedures are located here in this document from **page 11** onwards as part of the health and safety policy of *Hollymount Primary School*. If this is the case then the page number must be entered in the Location of Arrangement column.

Where, for operational reasons and ease of use, size of file/folder etc certain Arrangements e.g. fire safety management; critical incident management; school trips etc are contained within other documents then their exact location must be entered in the Location of Arrangement column so that staff are aware they exist and exactly where to find them.

The Headteacher are responsible for ensuring that suitable health and safety Arrangements and Procedures are in place at *Hollymount Primary School* and for ensuring the following tables are accurately completed at all times.



Table of Mandatory Arrangements

Table of Mandatory Arrangements for: Hollymount Primary School				
Subject Heading	Name and Job Title of Person Responsible	Location of Arrangement	Date of Issue	Date of review
Accident Reporting and Investigation	HT/SBM	Within H&S Policy Page 5	Jan 2019	Jan 2020
Asbestos Management	HT	Asbestos Management File – HT office	Dec 2018	
Client Handling	N/A			
Communication and Consultation with employees on health and safety matters	HT/SBM	Within H&S Policy Page 5	Jan 2019	Jan 2020
Control of Hazardous Substances	N/A			
Critical Incident Management	SBM/SLT	CIM policy – HT & school office	May 2019	2020 unless changes to arrangements
Educational Visits / School Trips, including residential visits and any school-led adventure activities	HT	“There and Back” – LBM Educational Visits guidance – HT office	Nov 2018	
Facilities / Buildings Management	SBM	Facilities Management File – school office	Current/ongoing	
Fire Safety and Emergency Arrangements including Evacuation Procedures	HT	Fire Safety management File	Sept 2016	Sept 2017
First Aid Arrangements and Supporting Medical Needs	HT/SBM	Within H&S Policy page 6 & Policy for Supporting Pupils in schools with Medical Conditions (School Policy	Feb 2017	Feb 2019



		File)		
Health and Safety Training for all staff	HT/SBM	H&S File	Ongoing	
Lettings	HT/SBM	School Policy file		
Lone Working	HT+	School Policy File	May 2014	
Subject Heading	Name and Job Title of Person Responsible	Location of Arrangement	Date of Issue	Date of review
Maintenance and Servicing of Services, Plant & Equipment (including statutory examination, inspection and testing)	SBM	Facilities Management File	Current/ongoing	
Managing Work Related Stress	HT	HR file		
Manual Handling of Static Loads	Site Manager	Within H&S file		
Occupational Health Services	SBM	SBM/Via Merton HR		
On-Site Vehicle Movements	N/A			
Personal Protective Equipment (PPE)	N/A			
Risk Assessment (including general and activity/task specific)	HT	Risk Assessment File		
Safety in School Science (CLEAPS)	N/A			
School / Workplace Safety Inspections	HT/SBM	Within H&S Policy pages 3 & 8		
School Security	HT/SBM	Within H&S policy page 8		
Selecting and Managing Contractors	HT/SBM	As per corporate guidance and best value statement		
	SBM	Medical room		



Slips, Trips and Falls		records/notifications		
Violence and Aggression to Staff	HT	Appendix to H&S Policy	Jan 2019	
Workstation (Display Screen Equipment) Assessments	HT/SBM/ICT Manager	Self-assessment forms in H&S file	Ongoing	



Violence & aggression statement (Appendix to Health & Safety Policy)

- The Health and Safety Executive has defined violence at work as:
"Any incident, in which an employee is abused, threatened or assaulted by a member of the public in circumstances arising out of the course of his/her employment".

Responsibilities

- Head teachers and managers have a responsibility to identify whether or not there is a problem of potential violence in their areas of work through the risk assessment process. No employee should be asked to carry out duties that would place them in danger of violence.
- Employees have a duty not to knowingly carry out any activity that would put them at risk of violence. Employees should ensure that they have read and understood all risk assessments regarding potential violence and aggression and must comply with the appropriate control measures.

Risk Assessment

- Questions relating to a history of violence and aggression should always be included in all referrals, assessment requests, and/or admissions documents. Where this is not forthcoming a 'worst case scenario' assumption must be implemented until information is obtained that refutes this.
- Where no relevant risk assessment is in place Managers are expected to take time to write one in order to ensure appropriate controls are in place for the safety of their staff and others.
- An appropriate risk assessment should always include information regarding the pupil's family history in order to identify past incidents, or likelihood, of violence. Where this has been established, staff should not be expected to have lone contact.

Pregnant workers

- It is the duty of staff members to inform the Headteacher as soon as they think they might be pregnant.
- A specific risk assessment must be undertaken and should include any potential risk of violence and aggression.

Visitors and contractors

- Hollymount School will not tolerate violence and aggressive behaviour towards its staff by visitors or contractors, especially from parents or family members. If this occurs the person should be written to emphasising that this will not be tolerated.
- The school has resort to a formal warning process which can result in that person being barred from the school site.
- Prior to sending any such letters, the Headteacher will consult Merton LA for legal advice as to whether the letter is appropriate under the particular circumstances.



- Visitors and contractors are controlled through the use of clear signage directing them to the main reception area. There is a secure entry system in place and a visitors signing in book. Any persons not authorised to be on the site will be challenged.

No unsupervised access to children will take place unless the person/s has been thoroughly checked through the CRB.

Trespassers

- Schools are private property, thus persons entering without permission or lawful authority to be there may be treated as trespassers. The school can ask a trespasser to leave. If they refuse to leave, a police officer or authorised person may be summoned to remove the trespasser.
- Parents have an expectation that they should be allowed to enter school premises, for example to bring or fetch children to and from school. However, parents should conduct themselves properly.
- If a parent or other visitor to the school does not conduct him/herself properly the school may write to them warning them that their conduct was unacceptable and that any further unacceptable behaviour could lead to them being banned from the school premises.

Reporting

- All injuries and violent incidents to staff members will be reported as soon as practicable after an incident to the Health & Safety department of Merton LA. Certain incidents may also be reportable to the HSE. The online system can be found at: <http://intranet01/accident/login.asp>
- The circumstances of an incident should be investigated at the earliest opportunity. Management actions will include a debrief with the staff member after the event to discuss what happened and why.
- Where remedial or protective action is required, such as 'aftercare' provision offered to staff e.g. counselling, then this should be carried out without delay.