



Health and Safety Policy and Procedures

Health and Safety at Work Act, 1974

Statement of Youth Works Northamptonshire's Health & Safety Policy

Registered Address: Keystone Centre, 97 Rockingham Road, Kettering, NN16 9HX

PART ONE

General Statement of Policy, Duties and Responsibilities

1.1 Policy Statement

Youth Works Northamptonshire ('the Organisation') recognises and accepts its health and safety duties for providing a safe and healthy working environment (as far as is reasonably practicable) for all its workers (paid and volunteer) and other visitors to its premises, under the Health and Safety at Work Act 1974, and any other relevant legislation and common law duties of care including:

- The Management of Health and Safety at Work Regulations 1999
- The Regulatory Reform (Fire Safety) Order 2005
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations, 1995
- Health and Safety First Aid Regulations, 1981
- Working Time Regulations

Throughout this Statement, terms such as 'staff', 'workers', 'employees', include both paid and volunteer workers.

Throughout this statement, the term 'premises' refers to the William Knibb Centre, Montagu Street, Kettering and Keystone Centre, Rockingham Road, Kettering.

It is the policy of the Organisation to promote the health and safety of the staff and of all visitors to the Organisation's premises ('the Premises') and to that intent to:

- Take all reasonably practicable steps to safeguard the health, safety and welfare of all personnel on the premises;
- Provide adequate working conditions with proper facilities to safeguard the health and safety of personnel and to ensure that any work which is undertaken produces no unnecessary risk to health or safety;
- Display the HSE poster entitled 'Health and Safety Law';

- Encourage persons on the premises to co-operate with the Organisation in all safety matters, in the identification of hazards which may exist and in the reporting of any condition which may appear dangerous or unsatisfactory;
- Encourage everyone to accept their own responsibility not to endanger themselves or others and to assist actively in fulfilling the requirements and spirit of legislation and good practice;
- Ensure the provision and maintenance of plant and other equipment and systems of work that are safe;
- Maintain safe arrangements for the use, handling, storage and transport of articles and substances;
- Provide sufficient information, instruction, training and supervision to enable everyone to avoid hazards and contribute to their own safety and health;
- Provide specific information, instruction, training and supervision to personnel who have particular health and safety responsibilities (e.g. a person appointed as a Health and Safety Officer or Representative);
- Make, as far as is reasonably practicable, safe arrangements for protection against any risk to health and safety of the general public or other persons that may arise from the Organisation's activities;
- Make suitable and sufficient assessment of the risks to the health and safety of employees and of persons not in the employment of the Organisation arising out of or in connection with the Organisation's activities;
- Make specific assessment of risks in respect of new or expectant mothers and young people under the age of eighteen;
- Provide information to other employers of any risks to which those employers' workers may be exposed to when on the Organisation's premises.

This policy statement and/or the procedures for its implementation may be altered at any time by Youth Works Northamptonshire's Board of Trustees ('the Board').

The statement and the procedures will be reviewed annually by the Board or other persons appointed by the Board.

1.2 Statutory Duty of the Organisation

The Organisation will comply with its duty to ensure, as far as is reasonably practicable, the health, safety and welfare at work of its workers and of visitors to its premises and, in general, to:

- Make workplaces safe and without risks to health;
- Ensure plant and machinery are safe and that safe systems of work are set and followed;
- Ensure articles and substances are moved, stored and used safely;
- Provide adequate welfare facilities;
- Give workers the information, instruction, training and supervision necessary for their health and safety.

In particular, the Organisation will:

- Assess the risks to the health and safety of its workers;
- Assess the risks to the health and safety of service users;
- Make arrangements for implementing the health and safety measures identified as necessary by this assessment;
- Record the significant findings of the risk assessment and the arrangements for health and safety measures;
- Draw up a health and safety policy statement, including the health and safety procedures and arrangements in force, and bring it to the attention of its workers;
- Appoint someone competent to assist with health and safety responsibilities and consult staff members about this appointment;
- Co-operate on health and safety with other employers sharing the same workplace;
- Set up emergency procedures;
- Provide adequate first aid facilities;
- Make sure that the workplace satisfies health, safety and welfare requirements, e.g. for ventilation, temperature, lighting and for sanitary, washing and rest facilities;

- Make sure that work equipment is suitable for its intended use, as far as health and safety is concerned, and that it is properly maintained and used;
- Prevent or adequately control exposure to substances that may damage health;
- Take precautions against danger from flammable or explosive hazards, electrical equipment, noise or radiation;
- Avoid hazardous manual handling operations and, where they cannot be avoided, reduce the risk of injury;
- Provide health surveillance as appropriate;
- Provide free any protective clothing or equipment, where risks are not adequately controlled by other means;
- Ensure that appropriate safety signs are provided and maintained;
- Report certain injuries, diseases and dangerous occurrences to the appropriate health and safety enforcing authority.

1.3 Statutory Duty of the Organisation's Workers

Employees also have legal duties and the Organisation strongly requests non-employed (voluntary) workers also to observe these. They include the following:

- To take reasonable care for their own health and safety and that of other persons who may be affected by what they do or do not do;
- To co-operate with the Organisation on health and safety;
- To use work items provided by the Organisation correctly, including personal protective equipment, in accordance with training or instructions;
- Not to interfere with or misuse anything provided for health, safety and welfare purposes; and
- To report at the earliest opportunity injuries, accidents or dangerous occurrences at work, including those involving the public and participants in activities organised by the Organisation.

1.4 Policy for Visitors and Contractors

All visitors should be directed, on arrival, to the appropriate member of staff who will take responsibility for the visitor(s) and assist in their evacuation from the building during an emergency or arrange help in the event of an accident.

On arrival, all visitors, including contractors and/or their workers, must sign a record of the date and time of their arrival and, on leaving, their time of departure. Contractors working in the premises should report any concerns relating to their own safety or suspected unsafe working practices to the Business and Finance Manager who will investigate and liaise with Northamptonshire County Council's Premises Facilitator (William Knibb Centre), the Board of Trustees (Keystone Centre), or other appropriate person.

PART TWO:

Organisation of Health and Safety

2.1 Health and Safety Sub-committee

The Board of Trustees has overall and final responsibility for health and safety matters at Youth Works Northamptonshire, and for ensuring health and safety legislation is complied with.

The Board of Trustees will appoint a Health and Safety Sub-Committee, including representation for both themselves and for staff (both paid and volunteer) to:

- have a broad overview of Health and Safety matters;
- keep the Organisation's Health and Safety policy and procedures under review;
- conduct safety tours of the premises;
- ensure that risk assessments are carried out, including assessments regarding substances hazardous to health (COSHH Regulations - see Appendix B);
- take such action as may be required to ensure that the Organisation's responsibilities for Health and Safety are fulfilled; and
- report to the Board on their performance of these responsibilities.

The Health and Safety Committee shall carry out 6-monthly safety tours and inspections of the premises and make a report to the next ordinary meeting of the Board.

All necessary actions as a result of the tour shall, where reasonable and practicable, be implemented. The tour shall include inspection of the Accident Book.

2.2 Health and Safety Rules

All workers must exercise ordinary care to avoid accidents in their activities at work and comply with the following general rules and with any further rules which the Organisation may publish from time to time.

a) Accident Book

Any injury suffered by a worker or visitor in the course of employment or otherwise on the Organisation's premises, however slight, must be recorded, together with such other particulars as are required by statutory regulations, in the accident book maintained by the Organisation.

b) Fire Procedures

All personnel must familiarise themselves with fire escape routes and procedures and follow the directions of the Organisation in relation to fire.

c) Equipment and Appliances

No equipment or appliance may be used other than as provided by or specifically authorised by or on behalf of the Organisation and any directions for the use of such must be followed precisely.

d) Safety Clearways

Corridors and doorways must be kept free of obstructions and properly lit.

e) Maintenance

Defective equipment, furniture and structures must be reported as such without delay.

f) Hygiene and Waste Disposal

Facilities for the disposal of waste materials must be kept in a clean and hygienic condition. Waste must be disposed of in an appropriate manner and in accordance with any special instructions relating to the material concerned.

g) Food Hygiene

When handling or preparing food there are specific hygiene requirements:

- Regularly wash hands before and during food preparation and always after using the toilet;
- Tell your line manager of any skin, nose, throat or bowel problem;
- Ensure cuts or sores are covered with blue waterproof dressings;
- Keep yourself clean and wear clean clothing;
- Remember that smoking in a food room, and other enclosed spaces, is illegal;
- Never cough or sneeze over food;
- Clean as you go. Keep all equipment and surfaces clean;

- Prepare raw and cooked food in separate areas. Keep perishable food covered and either refrigerated (less than 8°C) or piping hot (above 63°C);
- Ensure waste food is disposed of properly. Keep the lid on the rubbish bin and wash your hands after putting waste in it;
- Avoid handling food as far as possible;
- Tell your line manager if you cannot follow the rules;
- Advise your line manager of any defects or concerns regarding the facilities - e.g. uncleanness, refrigeration malfunction or cracked food preparation surfaces.

h) Display Screen Equipment

The Organisation recognises its responsibility to ensure the well-being of workers who habitually use display screen equipment for a significant part of their normal work. Workers are advised to ensure that they take a five minute break from the display screen equipment at least once an hour and are advised that, if they experience vision defects or other discomfort that they believe may be wholly or in part a consequence of their use of such equipment, they have the right to an eye-test at the Organisation's expense.

i) Alcohol, Drugs and Tobacco

Smoking within the premises and the use of drugs (except under medical supervision) on the premises are prohibited at all times. The use of intoxicants is prohibited during working hours and no employee may undertake his/her duties if under the influence of alcohol or drugs, except under medical supervision.

PART THREE:

Arrangements and Procedures

The Business and Finance Manager is responsible for ensuring that the safety policy is carried out and that responsibilities for safety, health and welfare are properly assigned and accepted at all levels.

3.1 Training

- Line Managers ensure all staff receive a copy of the health and safety policy and receive health and safety training as part of their induction. All staff will receive health and safety refresher training annually as a minimum.

3.2 First Aid and Accident Reporting

3.2.1 First Aid

- The First Aider(s) for the premises are John Garner, Theresa Wright,

Carole Carson, Eric Sithole, Joanna Gilbert, Helen Watts, Selina Guidera, Wesley Cash, Kelly McCann and Valentino Salvi.

- First Aid Boxes are provided in the following location(s):
William Knibb Centre - Café, reception (between 9am and 4.30pm), the upstairs office.
Keystone Centre – Café, workshop, medical room

3.2.2 Accidents

- In the event of an injury or illness, call for a member of staff or ring for an ambulance directly. To call an ambulance, dial 999 or 112 and ask for 'ambulance'.
- All accidents must be reported to the Business and Finance Manager or another member of staff on duty immediately or as soon as practicable.
- All accidents must be entered in one of the accident books situated in:
William Knibb Centre – upstairs office and reception.
Keystone Centre – with the first aid boxes in the Café and upstairs office.
The procedures for 'notifiable' accidents as shown in Appendix A below must be followed.
- The Business and Finance Manager will investigate incidents and accidents, writing a detailed report for the Organisation's Health and Safety Committee to consider the actions necessary to prevent a recurrence.

3.3 Fire Drills and Evacuation Procedures

3.3.1 Fire Drills

William Knibb Centre

- All workers and volunteers must know the fire procedures, position of fire appliances and escape routes.
- As a County Council building, the fire alarm points, fire exits and emergency lighting system are tested by Northamptonshire County Council's Premises Facilitator.
- The NCC Premises Facilitator will arrange for Fire Drills and Fire Prevention Checks (see Appendix C below) to be carried out at least once every three months and entered in the log book.
- The last person securing the premises will ensure Fire Prevention Close-Down Checks are made of all parts of the premises at the end of a session (See Appendix C.3).

Keystone Centre

- All workers and volunteers must know the fire procedures, position of fire appliances and escape routes.
- The fire alarm points, fire exits and emergency lighting system will be tested by the Business and Finance Manager during the first week of each month and entered in the log book provided.
- The Business and Finance Manager will arrange for Fire Drills and Fire Prevention Checks (see Appendix C below) to be carried out at least once every three months and entered in the log book.
- The last person securing the premises will ensure Fire Prevention Close-Down Checks are made of all parts of the premises at the end of a session (See Appendix C).

3.3.2 In the event of fire

- Person(s) discovering a fire should sound the nearest alarm.
- The first duty of all workers is to evacuate all people from the building by the nearest exit immediately after the fire is discovered.
- All persons must evacuate the building and, where possible without personal risk, leave all doors and windows closed.
- The assembly point/s are:
William Knibb Centre – in the rear visitors car park, along the perimeter wall.
Keystone Centre – in the front car park, along the perimeter with the public footpath.
- No-one should leave the assembly point without the permission of a member of staff/other appropriate person.

- If any fire occurs, however minor, the Fire Brigade must be called immediately by dialling 999 or 112 and asking for 'Fire Brigade'.
- When the Fire Brigade arrives the CEO, or in their absence the Business and Finance Manager (or if both absent, an appropriate member of staff) will advise whether all persons are accounted for and the location of the fire if known.

3.3.3 Bomb Warnings

- If you receive a warning try to find out from the caller:
 - the approximate location of the bomb and likely time of detonation;
 - whether the police and fire brigade have been notified.
 - Try to record exactly what is said.
- Notify the Police immediately on 999 or 112.
- Do not sound the Fire Alarm but evacuate the building taking into consideration any information from the bomb warning.

- Assemble in the rear visitor's car park along the perimeter wall (William Knibb Centre) or front car park along the perimeter with the public footpath (Keystone Centre) unless bomb warning implies otherwise.

3.4 Cleaning Materials, General Machinery and High Risk Areas

- All portable machinery must be switched off and unplugged when not in use.
- Wandering cables are a hazard; use with caution and safety in mind.
- Slippery floors are dangerous; use warning signs.
- Use protective clothing and equipment provided and as instructed on machinery/ equipment/material. It is the duty of a worker to report any loss of or defect in protective clothing or equipment.

3.5 Risk assessments

- All potential hazards will be identified and risk assessed. See separate Risk Assessment Policy.

3.6 General

- All thoroughfares, exits and gates must be left clear at all times.
- Corridors, stairs and fire exits must not be blocked by furniture or equipment.
- Vehicles must not be parked near to the building so as to cause any obstruction or hazard.
- Hazards or suspected hazards or other health and safety matters should be reported to the Business and Finance Manager immediately or as soon as practicable, so that action can be taken. If the hazard is of a serious nature, immediate action must be taken to protect or clear the area to prevent injury to staff or other users.

PART FOUR: APPENDICES

Appendix A - Accident Reporting

A.1. Accidents

All accidents which occur during work for the Organisation or on premises under the control of the Organisation must be recorded.

A.2. Accidents to Workers or Contractors' Staff

(a) For all accidents

Complete the Accident Book.

(b) For accidents reportable to the Health & Safety Executive (for contractors see A.2(c) below)

If accident results in incapacity for work for more than 7 calendar days then complete form F2508 with copies to:

Health & Safety Executive, 900 Pavilion Drive, Northampton Business Park,
Northampton,
NN4 7RG (Telephone 01604 738333) and the Chair of the Board of Trustees.

If accident results in fatality, fracture, amputation or other specified injury (see Section A.4. below) then immediately notify:

Health & Safety Executive and the Chair of the Board of Trustees.

Follow up within seven days with completed F2508 with copies to:

Health & Safety Executive and the Chair of the Board of Trustees.

(c) Contractors

If a reportable accident involves a contractor's employee and the premises are under the control of someone other than the contractor then the person in control of the premises is responsible for reporting the accident.

If a contractor's employee is at work on premises under the control of the contractor then it is the contractor or someone acting on his/her behalf that is responsible for reporting the accident.

A.3. Accidents involving Members of the Public

(a) For all accidents
Complete the Accident Book.

(b) For Accidents reportable to the Health & Safety Executive

If accident results in fatality, fracture, amputation or other specified injury (see Section A4 below) then immediately notify:

Health & Safety Executive and the Chair of the Board of Trustees.

Follow up within 7 days with complete F2508, copies to:

Health & Safety Executive and the Chair of the Board of Trustees.

Some injuries may not be fully identified until the casualty has been to hospital. It is therefore essential that, if it is known that an individual has gone to hospital as a result of an accident, follow up action is carried out.

A.4. Definition of Specified Major Injuries or Conditions

- Fracture of the skull, spine or pelvis; any bone in the arm or wrist but not a bone in the hand; any bone in the leg or ankles but not a bone in the foot.
- Amputation of: a hand or foot, a finger, thumb or toe; or any part thereof if the joint or bone is completely severed.
- Other specified injuries and conditions:
 - The loss of sight in an eye; a penetrating injury to the eye, or a chemical or hot metal burn to an eye.
 - Injury (including burns) either requiring immediate medical treatment, or involving loss of consciousness, resulting (in either case) from electric shock from any electrical circuit or equipment, whether or not it is due to direct contact.
 - Loss of consciousness resulting from lack of oxygen.
 - Decompression sickness requiring immediate medical treatment.
 - Either acute illness that requires treatment, or a loss of consciousness, resulting (in either case) from absorption of any substance by inhalation, ingestion or through the skin.
 - Acute illness requiring medical treatment where there is reason to believe that this resulted from exposure to a pathogen or infected material.
 - Any other injury which results in the person injured being admitted immediately into hospital for more than 24 hours.

IF IN DOUBT REPORT IT

A.5. Dangerous Occurrences

In the event of any of the following:

- Collapse/overturning of machinery;
- Explosion/collapse of closed vessel/boiler;
- Electrical explosion/fire:

Notify the following immediately:

Health & Safety Executive and the Chair of the Board of Trustees.

A.6. Occupational Diseases

- Poisoning;
- Skin Diseases;
- Lung Diseases;
- Infections.

On receipt of a written diagnosis from a Doctor, report the disease using form F2508A to:

Health & Safety Executive and the Chair of the Board of Trustees.

Full details of Dangerous Occurrences and Occupational Diseases can be found in the HSE Guide to RIDDOR.

IF IN DOUBT REPORT IT

Appendix B - Control of Substances Hazardous to Health (COSHH Regulations)

B.1. Assessment

The assessment must be a systematic review.

- What substances are present? In what form?
- What harmful effects are possible?
- Where and how are the substances actually used or handled?
- What harmful effects are given off, etc.?
- Who could be affected, to what extent and for how long?
- Under what circumstances?
- How likely is it that exposure will happen?
- What precautions need to be taken to comply with the COSHH Regulations?
- What procedures need to be put in place to comply with the Control of Asbestos Regulations 2006?

B.2. Prevention or Control

Employers have to ensure that the exposure of workers to hazardous substances is prevented or, if this is not reasonably practicable, adequately controlled. On the basis of the assessment, the employer has to decide which control measures are appropriate to the work situation in order to deal effectively with any hazardous substances that may be present. This may mean preventing exposure by:

- removing the hazardous substance;
- changing the process;
- substituting with a safe or safer substance, or using a safer form;
- Or, where this is not reasonably practicable, controlling exposure by, for example:
 - totally enclosing the process;
 - using partial enclosure and extraction equipment;
 - general ventilation;
 - using safe systems of work and handling procedures.

It is for the employer to choose the method of controlling exposure and to examine and test control measures if required. The Regulations limit the use of Personal Protective Equipment (e.g. respirators, dust masks, protective clothing) as the means of protection to situations where other measures cannot adequately control exposure.

Employers must provide any of their workers and, so far as is reasonably practicable, other persons on site who may be exposed to substances hazardous to health, with suitable and sufficient information, instruction and training so that they know the risks they run and the precautions they must take.

Employers must ensure that anyone who carries out any task in connection with their duties under COSHH has sufficient information, instruction and training to do the job properly.

Appendix C

Fire Prevention

C.1. Has the Fire Brigade Been Consulted on:

- The number and width of escape routes so as to provide a ready means of escape from all parts of the premises?
- Emergency Lighting and its maintenance?
- The most suitable way of raising an alarm in the event of fire?
- The contents of fire instruction notices?
- The numbers and types of fire extinguishers or other fire-fighting appliances which should be provided?
- Precautions to be taken with any activities involving the use of flammable liquids, naked flames or heating processes?
- The desirability of battening or clipping seats together in sets of four where moveable seats are used for large audiences?
- The maximum number of people who should be allowed on the premises at any one time?
- Are the escape routes kept usable?
- Are seating and gangways in the hall/rooms arranged so as to allow free and ready access direct to fire exits?
- Are exit doors always unlocked before the start of any session and kept unlocked until the last person leaves?
- Are escape routes and exit doors clearly sign-posted and marked so that anyone not familiar with the building can quickly see the ways out?
- Are escape routes and exit doors never allowed to become obstructed or hidden by chairs, stage props, curtains, etc.?

C.2. Is Fire Equipment properly looked after?

- Are fire extinguishers, hose reels and fire alarm systems (where provided) regularly maintained by specialist fire engineering firms?
- Are staff / duty officers trained to use this equipment?
- Is equipment kept in its proper position and always clearly visible and unobstructed?

C.3. Are Thorough Close-Down Checks Made of All Parts of The Premises at The End of an Evening or Session?

- No smouldering fires or cigarettes left burning?
- Heaters and cookers turned off?
- Televisions and other electrical apparatus turned off and unplugged?

- Lights off?
- Internal doors closed?
- Outside doors and windows closed and secured?

C.4. Are All Reasonable Steps Taken to Prevent Fires?

- Smoking not allowed in any enclosed spaces, including in the building?
- Substantial ashtrays provided in outside areas where smoking is permitted?
- Heating appliances fitted with adequate and secure fire guards?
- If portable heaters have to be used, are they securely fixed and kept away from combustible materials?
- Precautions to ensure that convector type heaters are not covered with clothes and curtains?
- Temporary extensions or additions to the electrical installation carried out and checked by a competent electrician?
- Sufficient socket outlets provided to obviate the need for long trailing flexes?
- Damaged leads replaced regularly?
- Cooking operations supervised by a reliable person?
- Scenery, decorations and costumes for stage performances treated to make them flame retardant?
- All parts of the premises kept clear of waste and rubbish, particularly staircases, spaces under stairs, store rooms, attics and boiler rooms?

Appendix D

Display Screen Equipment

D.1. Who Is a Display Screen User?

The Regulations are for the protection of workers (including self-employed workers) who habitually use display screen equipment for a significant part of their normal work.

In some cases it will be clear that the use of Display Screen Equipment is more or less continuous on most days and the individuals concerned should be regarded as users. Where use is less continuous, 'user' status would apply if most or all of the following criteria are met.

- The individual depends on the use of display screen equipment to do the job, as alternative means are not readily available for achieving the same results;

- The individual has no discretion as to the use or non-use of the display screen equipment;
- The individual needs significant training and/or particular skills in the use of display screen equipment to do the job;
- The individual normally uses display screen equipment for continuous spells of an hour or more;
- The individual uses display screen equipment in this way more or less daily.
- Fast transfer of information between the user and the screen is an important requirement of the job;
- The performance requirements of the system demand high levels of attention and concentration by the user: for example, where the consequences of error may be critical.

D.2. Eye Testing and Spectacle Costs

There is no reliable evidence that work with a display screen causes any permanent damage to eyes or eyesight, but it may make the user with pre-existing vision defects more aware of them. This may give rise to visual fatigue and headaches. It is worth noting that these symptoms can also be due to poor lighting, incorrect posture, poor workstation layout, design or maintenance of hardware or other problems. All of these can, separately or in combination, cause eye discomfort.

D.3. Workers' Entitlement.

D.3.1 Eye Test

Any worker covered by the Regulations is entitled to request an eye and eyesight test which will be paid for by the employer. Workers should inform their line manager, who will provide them with the forms to take to an optician of the worker's choice.

A worker may request a test if s/he:

- is already a user for a significant part of her/his work.
- is about to start using display screen equipment for a significant part of his/her work.
- is experiencing visual difficulties which may reasonably be considered to be related to display screen work.
- it is recommended by an optician at the time of an eye examination that the worker should have eye tests at regular intervals.

D.3.2 Spectacles (Glasses)

If, as a result of the eye tests, a worker requires spectacles solely for use with display screen equipment, s/he is entitled to reimbursement of the cost of a basic pair. If the worker wishes to choose more costly spectacles (e.g. a more expensive frame), the employer is not obliged to pay the full cost of these. In this event the worker will only be reimbursed for the cost of basic spectacles.

If, as a result of the tests, spectacles are required for normal use, e.g. reading or distance vision, but which may also include display screen equipment use, under the Regulations the employer is not required to make reimbursement beyond the cost of the eyesight test and the report.

D.3.3 Who pays the Optician?

The worker pays the optician and then obtains reimbursement, attaching the receipt(s) and any other reports to form DSE1, and gives these to his/her Line Manager who will arrange reimbursement.

We request that our staff, members and visitors respect this Policy, a copy of which will be available on demand.

This policy will be reviewed annually in May and approved by the Board of Trustees.