

DRAFT

HEALTH AND SAFETY POLICY

July 2021

This policy will be updated as our business changes and in line with new legislation. It will be reviewed and updated as necessary, a minimum of once a year. Where you see reference to the term 'student' in this policy, this applies to all 16-19 study programme students, students on traineeships and apprentices.

Review Date		Next Review Date	
Plan Owners			
Governance Sign Off Date			
Managing Director Signed		MD Print	
Date policy signed off by MD			

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1. GENERAL STATEMENT OF POLICY

We owe a duty of care to all staff, students, visitors, employers and other stakeholders. Reference to students includes apprentices and students participating in all ***insert*** programmes.

In order to discharge this duty we take steps to ensure working and learning environments are safe with risks to health being reduced to a minimum or eliminated. These steps include:

- Centre fire and H&S risk assessments
- Well designed, user friendly documentation.
- Robust action plans
- Staff awareness & training initiatives
- H & S being an agenda item at board and centre meetings
- H & S training to students
- Robust vetting & approval process for placement companies
- H & S being part of student reviews
- Common sense at all times
- An annual review of the policy

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2. ROLES & RESPONSIBILITIES

Governors

Reviewing and approving policy, and ensuring compliance.

Managing Director

Has ultimate responsibility for H & S in the company and delegates the operational management of it to the Head of Operations.

Head of Operations

Responsible for the operational management of H & S in the company including changes to policies and procedures and resourcing of centres. The focal point for all H & S matters. First point of contact to funding bodies and external partners. Co-ordinator of our overall approach. Line management responsibility for the Premises Manager and Data Manager.

Premises Manager

Ensures audits, testing and repairs are carried out in a timely manner to conform to legislation and good practice at all times. Prioritises and co-ordinates workload with Head of Operations (Line Manager). IOSH qualified.

Head of Quality

Responsible for safeguarding management in the company. Co-ordinates our overall approach. Shapes policy and develops processes.

Regional Heads of Performance

Represents staff & students across centre network. Reports issues to the Head of Operations and/or Head of Quality and ensures agreed action to correct is taken. Help develop better processes & shape policy.

Progression Officers / Progression Coordinators

Qualified or working towards a minimum of British Safety Council Certificate in Risk Assessment. This qualification is for individuals who are responsible for risk assessing organisations as part of a process of confirming their suitability for work placements. Carry out workplace vetting in accordance with latest policy & procedures. Help develop better processes & shape policy.

Performance Managers

Responsible for H & S in their Centre and is the first point of contact. Keep staff & students informed of H & S updates/changes. Review the learning & working environment in training centres and work with colleagues to bring about the necessary changes/improvements. Carry out maternity risk assessments and risk assessments for people with disabilities and/or specific learning differences. Help develop better processes & shape policy.

HR

Responsible for risk assessments for staff with disabilities and driving at work compliance.

Key Holders

The Head of Operations, Premises Manager and Performance Managers are designated persons to respond to 'out-of-hours' call outs. Key holders will be contacted by the alarm company on activation. Key holders should not agree to respond to a call out if they are over the legal alcohol limit to drive. They should be mindful of their own safety and if concerned about possible intruders on site, they should telephone the Police and await their arrival prior to entering the building. Before leaving the premises, the key holder should ensure the building is secure and the alarm re-set.

All employees

Share a collective responsibility for ensuring we offer safe environments to all staff/students/visitors. Our health and safety eyes and ears.

3. MANAGEMENT OF HEALTH & SAFETY

Students in our training centres

- Are introduced to premises layout, health & safety requirements, emergency and first aid procedures during induction.
- Are introduced to the concept of “safe working” in readiness for work experience or employment. This concept is embedded throughout their time with us.

Students in placement companies

- All placement companies are vetted and rated low, medium or high risk. Only placement companies demonstrating a satisfactory approach to health & safety are used. HSE guidance states that the employer offering the work placement has primary responsibility for the H & S of the student and should manage any significant risks.
- We ask that students are allocated supervisors/mentors who can responsibly oversee their activities in a way, which reduces the risk of accidents.
- Work placement vetters have or are working towards British Safety Council Certificate in Risk Assessment (or equivalent) and appropriate occupational experience.
- H & S forms part of each student review. Adverse findings are investigated and actioned.
- We reserve the right to take additional measures to protect vulnerable students, e.g. DBS check.

Student trips / outings

- For accompanying students on trips/outings, the ratio is 1 staff member to 15 students (maximum). 2 staff members are required for accompanying between 16 and 30 students.
- Risk assessments are undertaken and steps taken to reduce any identified risks.

Accident and near miss reporting

- All accidents and incidents are recorded electronically on the company intranet. Those resulting in serious injury are reported immediately to the Head of Operations.
- Near misses are reported in writing (E-mail) to the Head of Operations. Immediate action is taken to address if necessary.
- The Head of Operations and Head of Quality investigate accidents which result in serious injury & take action to reduce or eliminate the chances of re-occurrence.
- Serious accidents/incidents are reported to the ESFA & local authority (if appropriate) via our ESFA Contract Manager.
- The Head of Operations follows RIDDOR procedures when necessary, reporting any RIDDOR incidents at <https://www.hse.gov.uk/coronavirus/riddor/index.htm> (additional info available at <https://www.legislation.gov.uk/ukxi/2013/1471/contents/made>) within 10 days of the incident. Our ESFA Contract Manager will also be informed within 10 days of the incident.
- All accidents & near misses are recorded on to a database for review by the Head of Operations. Reports are compiled and reviewed at Board/Governance meetings every quarter, with action taken to reduce/eliminate risks as appropriate. Action needed by centres is channelled via Regional Heads of Performance to Performance Managers.
- Ill-health of students is also reported and consideration given to contagion and cause, including factors to mitigate symptoms.

Staff training

We ensure that staff are trained to implement this policy in various ways. These include training during staff induction, involving them in risk assessments, specific H&S qualifications for those undertaking risk

assessments, H&S as an agenda item in centre and Board meetings, training around Run, Hide, Tell, centre risk assessments being visually displayed and discussed in team meetings, refresher training, First Aid training and an annual policy review.

Subcontractors

For subcontractors, we review their Health & Safety policy, processes and procedures and where they are not sufficiently robust in comparison to our own H&S intent, responsibilities and arrangements, we ensure that subcontractors adopt our H&S protocols and these are reviewed at contract meetings. For those subcontractors with robust H&S systems in place, we do not require them to use our protocols, but we continue to review their H&S systems at contract meetings.

Lone Workers

- Lone workers are categorised as staff working within a training centre separately from others (e.g. isolated training room) or those who are mobile working away from their training centre (e.g. Recruitment Officers and Progression Officers carrying out outreach activities, vetting checks, reviews etc) or those staff working from home or those staff not attending staff training days.
- It is our policy to give instruction & training to such staff which minimises or eliminates the risk of danger or harm.
- All staff are asked to accept that they have a responsibility to take reasonable care of themselves.
- The risk assessment is evidenced in writing and retained at centre level.
- Lone working at centres when not attending training days/conference will do so without students being present in the centre. Performance Managers will confirm duties to be carried out during the day and check in with the lone worker at a minimum of 3 times during the day (morning, lunch time, afternoon). The lone worker will have the mobile number of the Performance Manager to contact in case of emergency. The lone worker will ensure the building is locked and secure on departure.
- The HSE “Working Alone in Safety” booklet is displayed on notice boards in each centre to give the matter appropriate prominence.

Health & Wellbeing

insert are committed to improving the health and well-being of their employees. We have several well-being programmes and benefits that are aimed at reducing sickness absence, improving employee well-being and promoting a work-life, balance. More details can be found at

Shared buildings & toilets

- To safeguard students and minimise the risk of students in shared buildings using shared/common toilet facilities, staff ensure that students return from the toilet within a sensible timeframe, and in any cases where it has been a long period of time (5 minutes +) a member of staff will check the facilities.

Maternity

- A risk assessment of the employee’s working environment is carried out by the Performance Manager (copy sent to HR):
 - (i) immediately we are formally informed of the pregnancy
 - (ii) at mid term
 - (iii) on return to work
- The health & well being of the “mum to be” is regularly monitored by the line manager throughout the pregnancy and adjustments made as necessary.

Disabilities and/or specific learning differences

- Risk assessment completed by the Line Manager/HR/Student Support Manager when informed that a member of staff/student has a disability and/or specific learning difference:
 - (i) Working Practices – Reasonable Adjustments Sub Form is completed with recommendations
 - (ii) Reviewed as a minimum annually, but more frequently if deemed necessary
 - (iii) Student assessment is kept on the student file. Staff assessments are sent to HR Manager, with a copy retained by the Line Manager

Fire drills & evacuation

- All centres have a fire marshall who takes responsibility for co-ordinating evacuations. The identity of whom is displayed prominently in reception areas.
- The evacuation procedure and meeting point is displayed prominently in all rooms.
- The fire alarm is tested weekly by the landlord/building managers/centre staff.
- Dry run evacuations are conducted a minimum of twice per annum.
- Supply and maintenance of fire extinguishers is contracted out. See extinguishers for latest supplier.
- *Disabled evacuees* – evacuation apparatus is provided where necessary. When the evacuation is dependent on stairs “safe zones” in close proximity to the centres are established. Evacuees are to be positioned here to await the help necessary to have them removed from the building. To be accompanied by a member of staff at all times.
- *Visually impaired* – will be accompanied by a member of staff at all times, and receive clear verbal instructions.
- *Hearing impaired* - will be accompanied by a member of staff at all times, and receive clear physically noticeable gestures.

*****insert*** Hostile Attack – see ‘Hostile Attack Procedures’**

The most likely scenario for a hostile intruder/s at ***insert*** are intruders who have intentions of injuring a person(s) they know and could already be at ***insert*** (i.e. another student or member of staff). This situation would be dealt with locally with assistance from the police. In this situation every attempt must be made to keep the assailant(s) and the intended victim(s) apart and keep the assailant(s) out of ***insert*** premises/rooms. A lock-down situation is NOT necessary in these situations unless events escalate and mass casualties become likely.

Bomb threat / unidentified item

- In the event of a bomb threat (verbal or written), the building alarm is raised and the evacuation procedure followed, with emergency services informed immediately. All mobile devices are switched off. Where possible evacuation is via a route with limited amounts of windows/glass. The fire evacuation meeting point is sufficiently far enough away from the building for person safety if the bomb were to detonate.
- In the event of finding an unidentified item, the emergency plan followed is in proportion to the level of risk. The risk is assessed by staff, and if in any doubt the above procedure is followed.

Run, Hide, Tell

- Recent events in the UK and around the world remind us all of the terrorist threat we face, which in the UK is considered as 'SEVERE', meaning an attack is highly likely. Police and security agencies are working tirelessly to protect the public but it is also important that individuals remain vigilant and aware of how to protect themselves if the need arises, hence the implementation of Run, Hide, Tell guidance issued by the Counter Terrorism Police. All staff and students at ***insert*** were briefed and made aware of this during their induction:
 - o **Run** to a place of safety. This is a far safer option than to surrender or negotiate. If there’s nowhere to go, then.....
 - o **Hide** – it’s better to hide than confront. Remember to turn your phone to silent and turn off vibrate. Barricade yourself in if you can. Then finally and only when it is safe to do so.....

- **Tell the police by calling 999.**

First Aid

- All centres have a first aid box with a standard range of supplies positioned in a prominent place known to all staff.
- All centres have a first aider who is appropriately qualified, or working towards an appropriate qualification. The identity of the first aider is displayed prominently in the reception area.

Driving at work

This section is aimed at employees that use their vehicle as part of their job role and/or travel from their home to somewhere which is not their usual place of work. It does not apply to travelling between the employees home and their usual place of work.

More than a quarter of all road traffic incidents involve somebody who is driving as part of their work. Our aim is to effectively manage work related road safety and reduce the risk to our employees. Staff that require the use of their vehicle to carry out their job role / visit other sites, complete an employee driver declaration form (for new staff this is completed on starting with the company) which is reviewed annually. Employees are to:

- Provide a copy of the UK driver's licence to HR, and annually thereafter
- Immediately update HR with any driving convictions/points as they occur
- Annually, provide a valid and current copy of the insurance certificate to HR. Business use cover is a minimum requirement
- Carry out vehicle checks before departure e.g. tyres, seat position, seat belt, windscreen, wipers & washers, mirrors, brakes, lights, indicators, hazards, fuel
- Monitor the vehicle on the road – engine temperature, fuel, warning lights
- Not drive under the influence of alcohol or drugs
- Not use a hand held mobile when driving. Using a hands free function can seriously affect concentration too
- Not drive while taking medicine that might impair their judgement. If in doubt, they should consult their GP
- Not drive when tired. This is dangerous. Drivers should take regular breaks (the Highway Code recommends a 15 minute break every 2 hours)
- Satisfy their eyesight and other health requirements of the Highway Code and DVLA
- Share health concerns that may affect driving with HR immediately
- Have a roadworthy vehicle. We recommend that it is serviced in line with manufacturers recommendations, and where the vehicle is over 3 years old it must have a valid MOT certificate
- Not drive vehicles that are unsafe for road use, under any circumstance
- Follow the Safe Journey protocol – ensure enough time is allowed for each journey, research the best route to take, do not exceed safe speeds / speed limits, adjust journey times in poor weather conditions, delay journey if weather conditions are too severe, consider alternative modes of transport e.g. train
- Be aware of what action needs to be taken in an emergency situation
- Report all work related driving incidents, accidents and near misses electronically on the company intranet ("Incident/Accident Report" section)
- Risk Assessments – single journeys of more than three hours or 125 miles are subject to risk assessment. These must be approved by the line manager before the journey can take place

Visitor Policy

- ***insert*** has a duty of care to protect visitors in the same way that staff and students are protected, to ensure the health, well-being and safety of all. We expect all visitors to work in

accordance with the same guidelines and principles to protect students. The Visitor Policy and Protocols confirms this.

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4. H & S framework

Our Head of Operations polices the following key documents/processes to ensure compliance with our policies & procedures:

	<i>What</i>	<i>Done by</i>	<i>When</i>
1	Risk assessment – ***insert*** centres	Performance Managers	December annually
2	Risk assessment - maternity	Line Manager	On being informed/mid term/return to work
3	Risk assessment – placement company	Qualified staff	On first use, 6 monthly/annually thereafter, depending on risk assessment review date
4	Accident & near miss summary	Head of Operations	Reported to management board quarterly (or sooner if required)
5	RIDDOR	Head of Operations	When accident/incident occurs
6	Evacuation drill evidence	Performance Manager	January & June
7	Identity of First Aiders & Fire Marshalls	Performance Manager	Review quarterly
8	Risk for Persons with Disabilities and/or Specific Learning Differences	Performance Manager / All Staff	When occurs

Staff Declaration

Centre Name: _____

I have read and fully understand the Health & Safety Policy

Name	Signature	Date