

Health and Safety Policy.

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1. IN THE EVENT OF AN ACCIDENT OR SUDDEN ILLNESS AT WORK

If there is an accident or someone becomes suddenly ill, the procedure to follow is:

- Take any action required to deal with the immediate risk
- Contact the emergency services if necessary
- Contact your supervisor (or, if at an employer's premises, the main employer contact person) and make them aware of the situation
- Ensure the incident is properly recorded in the accident book(s) so that we can thoroughly investigate the matter and prevent a future recurrence. The accident book(s) are located:
 - On our shared drive: within our Dropbox, UK Team\Apprenticeships\Policies & Procedures\Policies and Procedures Approved \Accident Book.xlsx
 - At the employer's premises, if relevant

2. GENERAL STATEMENT OF POLICY

- It is our policy to comply with the terms of the Health and Safety at Work Act 1974 and subsequent legislation, to provide and maintain safe and healthy working conditions, equipment and systems of work for all our employees and learners and to provide such information, training and supervision as they need for this purpose.
- We also recognise and accept our responsibility to protect the health and safety of all visitors to the workplace (including learners, contractors, temporary staff and any members of the public) who might be affected by our activities. We will also co-operate on health and safety matters with employers when working at their sites.
- A copy of this policy will be issued to each member of staff. The policy will be kept up to date and the way in which it has operated will be reviewed each year.
- The specific arrangements for the implementation of the policy and the personnel responsible are set out below.

3. RESPONSIBILITIES AND ARRANGEMENTS FOR HEALTH & SAFETY MANAGEMENT

a. THE PARTNERS

- The Health and Safety at Work Act 1974 places a statutory duty on all employers to ensure, so far as is reasonably practicable, the safety, health and welfare of all its employees at work and other people who may be affected by their activities, e.g. users, volunteers, members of the public.
- The Partners have overall and final responsibility for health and safety matters in our business and for ensuring that health and safety legislation is complied with. In particular the partners will ensure that:
 - Employees receive sufficient information, training and supervision on health and safety matters
 - Line managers are aware of their responsibilities to their staff and others
 - A risk assessment is undertaken and the results written up and made available to all employees
 - Accidents are investigated and reported to the partners
 - There are arrangements in place to monitor the maintenance of equipment

- Our Health and Safety Work Officer has the time, facilities and resources to carry out its business effectively.
- The Partners will review the operation of our health and safety policy annually.

b. EMPLOYERS

- Where training of Apprentices is undertaken at Employer's premises, the prime responsibility for the health and safety of the apprentice lies with the host Employer. However, we have a duty of care to take reasonable measures to ensure Apprentices are not put at undue risk when working for Employers who we engage with.
- To fulfil this duty of care, we will obtain initial confirmation from prospective Employers that they understand their responsibilities to Apprentices and have a robust health and safety management system in place relevant to the Apprentices.
- We will further carry out periodic checks of Employers to monitor their ongoing suitability for the scheme in terms of their management of health and safety and fulfilment of their responsibilities.
- The Employer has the prime responsibility for the health and safety of Apprentices and must ensure all relevant legislative requirements are complied with. In particular this includes, but is not limited to:
 - taking primary responsibility for the health, safety and welfare of Apprentices, controlling risks to safety and health appropriately
 - having a written Health and Safety Policy in place that sets out a clear commitment to managing the health and safety of Apprentices
 - having procedures for carrying out risk assessments, and bringing the assessment findings to the attention of Apprentices
 - having a clear process for reporting accidents and health and safety concerns
 - ensuring Apprentices receive adequate support and guidance to create a productive and positive experience
 - providing an appropriate health and safety induction and ensuring that instruction, site familiarisation, personal protective equipment, training and supervisory arrangements are fit for purpose (to include: fire precautions; emergency evacuations and first aid arrangements; how to report accidents, incidents and unsafe conditions)
 - providing a safe working environment and non-discriminatory treatment
 - cooperate with the our Engagement Manager or instructors as far as is necessary when following up on identified health and safety issues
 - informing us of any incidents involving our staff or Apprentices
 - ensuring insurance is in place to cover liability for any injuries, ill health or property damage sustained that is attributable to the activities of the Apprenticeship provision

c. THE COMPETENT PERSON

- The Partners will appoint at least one "competent person" as defined in the Management of Health and Safety at Work Regulations 1999.
- The competent person will report to the partners and will assist in assessing the health and safety risks to the organisation's employees and devising and applying measures to improve health and safety. The partners will ensure that the competent persons have adequate time, information, training and resources to undertake their task.
- All employees will be told who the competent person is.
- The competent person at the time of issuing this policy statement is: David Hampton

d. OUR EMPLOYEES' RESPONSIBILITY

- All employees have the responsibility to co-operate with the partners and manager to achieve a safe and healthy workplace and to take reasonable care of themselves and others.
- Employees must not intentionally or recklessly interfere with anything provided for their health, safety and welfare. Serious breaches of the Health and Safety Policy and rules (e.g. misusing equipment, deliberately putting someone else's safety in danger) will be dealt with through our Disciplinary Procedure.

- Whenever an employee notices a health or safety problem which they are unable to put right, they must immediately inform one of the line managers
- Health, safety and welfare matters may be raised by any employee at the earliest opportunity.

e. APPRENTICES' RESPONSIBILITY

- Apprentices are responsible for:
 - taking reasonable care of the health and safety of themselves and others
 - co-operating with us and their Employer on matters of health and safety
 - abiding by the rules and regulations of the Employer
 - informing us and the Employer of any personal factors or changes to personal factors (e.g. health, disability, linguistic or cultural) that may affect the level of risk attached to the Apprenticeship or may require reasonable adjustments to be made
 - reporting to us and the Employer any incidents or issues that occur or any concerns regarding health and safety

f. FIRE OFFICER

- The partners will appoint one Fire Officer who shall receive appropriate training. At the time of issue of this policy the Fire Officer is: David Hampton
- The responsibilities of the Fire Officer will be to:
 - instruct on potential fire hazards and the use of firefighting equipment
 - ensure that the testing of fire alarms and fire drills is carried out at regular intervals, if/when applicable
 - assist with the efficient evacuation of staff, learners and visitors.
 - liaise with the Fire Brigade and Apprenticeship Operations Manager or one of the Partners at the assembly point.
 - ensure that all staff are aware fire alarms and fire drills.

g. FIRST AIDERS

- At the time of issuing of this information, the employees who have undertaken a recognised training course approved by the Health and Safety Executive are David Hampton and Michael Akers
- The trained first aider(s) named above will ensure that the first aid box is kept in the correct place, contains the items laid down in the Code of Practice and Guidance Notes published by the Health and Safety Executive (and nothing else) and is regularly restocked.

4. RISK ASSESSMENT

- The partners will ensure that a competent person carries out a risk assessment in accordance with the 1999 Management of Health and Safety at Work Regulations and the Approved Code of Practice (ACOP). Any significant risks from the assessment will be written up, and be made available to all staff.
- The written risk assessment will be reviewed and updated annually to ensure it covers all employees against all risks, and to ensure that any action identified as needed in the risk assessment has been carried out. The risk assessment will also be updated every time that there is a major change in working practices. The risk assessment will cover all our employees, wherever they may be based, and will cover all aspects of their work.

5. TRAINING

- We will ensure that new employees receive information on health and safety as part of their induction.

- We will organise training for employees on health and safety matters as appropriate, including: general health and safety training, first aid and fire safety. We will also organise training for appropriate use of equipment, and any special training needed to ensure safe systems of work.
- If employees consider they have health and safety training needs they should inform their line manager.

6. SAFE FACILITIES

- We have a responsibility to provide a safe and healthy environment for staff and learners. The competent person will be responsible for liaising with the partners to ensure that any repairs are carried out swiftly with the minimum of disruption.
- All staff are responsible for spotting hazards or potential hazards. If a hazard is seen, it should be removed or dealt with as soon as possible, or if not, reported to the competent person.

a. EXAMPLES OF HAZARDS:

- Things out of reach:
 - Chairs or other furniture must not be used to stand on for the purposes of replacing light bulbs, reaching for things off tops of cupboards etc. A properly maintained, undamaged step ladder must be used.
- Damaged Equipment:
 - Regular checks must be carried out on furniture and equipment for damage which leaves sharp edges protruding or other hazards. Any damaged furniture must be reported for repair or condemnation straight away and must be removed from use.
- Damage to fabric of building, windows etc:
 - All such damage must be reported immediately to the Apprenticeship Operations Manager or partners.
- Misplaced Furniture, Equipment or Supplies:
 - Any furniture, equipment or supplies left in an inappropriate place, for example obstructing a gangway, must be removed immediately, and placed in an appropriate, safe place.

b. GOOD HOUSEKEEPING

- Aisles, corridors and gangways must be kept clear from obstructions and materials must be stored in safe areas. Under no circumstances must goods or materials be stacked immediately in front of or obstructing fire doors, fire exits, fire alarms or fire equipment.

c. SMOKING

- We have a no smoking policy enforced within our premises, including our residences and any offices that we may use from time to time. Staff may only smoke outside.

d. OVERCROWDING and VENTILATION

- The general minimum space per person, recommended by the 1992 Regulations is 11 cubic metres. We will avoid unhealthy and overcrowded working conditions, and will consult staff on any changes in office/work area layout. We will ensure that we meet the prevailing requirements for the spread of infectious diseases such as Covid.
- We will endeavour to provide a well ventilated workplace in which staff have control over their local level of ventilation. We will ensure that we meet the prevailing requirements for the spread of infectious diseases such as Covid.

e. TEMPERATURE

- In office workplaces and other work areas, a minimum temperature of 16°C must be maintained. Efforts will be made so far as is reasonably practical to ensure the workplace temperature does not rise to an uncomfortable level. A thermometer or digital thermostat will be provided in a conspicuous place and in such a position as to be easily seen. We will do everything in our power to ensure reasonable temperatures in the workplace at all times.

f. LIGHTING

- Adequate lighting must be provided. If lights are found to be out of order, the fault must be corrected as soon as reasonably possible.

g. NOISE

- We will endeavour to ensure that noise is kept to as low a level as is practicable.

h. ATMOSPHERIC POLLUTANTS

- Office equipment such as photocopiers and printers can emit pollutants into the atmosphere. We will take reasonable precautions in ensuring that these levels are kept as low as is possible. Employees will not be expected to work in enclosed spaces with equipment that emits atmospheric pollutants. Spaces where these pollutants are present shall be kept well ventilated.

i. EQUIPMENT STORAGE AND USAGE

- Equipment must not be left lying around but must be suitably stored.
- No wires must be left trailing across floors.
- Non flammable rubbish bins must be positioned at various points.

j. ELECTRICAL EQUIPMENT

- All building maintenance such as electrical work, carpentry, painting etc should be carried out by skilled people. No staff (unless suitably trained and deemed competent) should endanger themselves or others by carrying out such work.
- Broken, ineffective or damaged electrical equipment must be reported to the competent person.

7. WELFARE ARRANGEMENTS

a. TOILETS AND WASHING FACILITIES

- Where we work away from our residences, we will seek to ensure that suitable and sufficient toilets and washing facilities are provided for all staff in accordance with the minimum requirements of Health and Safety legislation.
 - Each toilet will be in a separate, lockable room.
 - washing facilities will include a supply of clean hot and cold water, soap and suitable means of drying (e.g. paper towels)

b. DRINKING WATER

- Where we work away from our residences, we will seek to ensure that an adequate supply of drinking water will be provided for all learners and staff.

c. REST AREAS

- Where we work away from our residences, we will seek to ensure that so far as is reasonably practicable all learners and staff have access to seating in a rest area, where they may rest during normal work breaks.

d. PREGNANT WOMEN

- Where we work away from our residences, we will seek to ensure that suitable rest facilities will be provided for pregnant learners and employees.

e. HOURS OF WORK

- Our Partners, contractors and employees should not work excessively long hours, and should take adequate breaks for meals and rest as indicated within their statements of terms and conditions of employment.

8. PERSONAL SAFETY

- Under no circumstances should staff put themselves at risk on account of our property. If money is demanded with threats it should be handed over.
- Any incidents of aggression or violence should be reported to partners and recorded on an incident form and in the accident book if an injury has been sustained.
- Employers have a responsibility to provide a safe working environment. Staff should report any current or potential situation at work which is a threat to personal safety. Talking about fear and other problems related to aggression or harassment is not a mark of failure but good practice. A serious incident, even if it results in no physical harm, may cause feelings of fear, panic or despair which can carry on long afterwards. The management recognises this and will be disposed to provide whatever support, counselling or time off work seems appropriate.

9. DISPLAY SCREEN EQUIPMENT

a. GENERAL

- It is our policy to comply with the law as set out in the Health and Safety (Display Screen Equipment) Regulations 1992.
- We will conduct health and safety assessments of all workstations staffed by employees who use display screens as part of their usual work. All workstations must meet the requirements set out in the Schedule to the Regulations.

b. NATURE AND ORGANISATION OF WORK

- Appropriate seating must be available to all users.
- Staff will take regular breaks (at least 10 minutes away for every hour at the screen). Short frequent breaks are more satisfactory than occasional longer breaks.

c. EQUIPMENT

- We will ensure that the use of computer equipment is consistent with the need to avoid back, neck and shoulder pains, headache, eyestrain and overuse injuries of the arms and hands.

d. MAINTENANCE

- The competent person should hold copies of manufacturers' detailed instructions on the maintenance of any machinery that we may acquire, and will ensure that maintenance contracts are adhered to and, where appropriate, renewed.

e. EYE AND EYESIGHT TESTS

- Staff are entitled to have eyesight tests paid for by us if their job involves long periods of time in front of any screens or if they are experiencing eyesight problems that could be attributable to their work.
- Where a test shows that as a result of work with screens a member of staff needs to purchase special corrective appliances (usually glasses), we will pay for these. This excludes those normally used for purposes other than work.

f. WRULDS/RSI

- Work Related Upper Limb Disorders (also known as Repetitive Strain Injury) are often associated with keyboard work. By following best advice to provide screen/keyboard equipment and furniture we intend to prevent the development of these musculoskeletal disorders. Staff however should contribute to their own safety and welfare by:
 - avoiding sitting in the same position for long periods
 - adjusting equipment and furniture to appropriate/comfortable positions
 - taking a rest break from screen work (at least 10 minutes away every hour) by doing some other work.

10. FIRE SAFETY

a. GENERAL

- It is not only the responsibility of the Fire Officer but of all staff to be aware of fire hazards, to know the location of fire exits and the assembly point. Everyone must know the fire drill instructions, and these will be part of the induction process for all new staff.
- Access to escape doors, extinguishers and other firefighting equipment must not be obstructed.

b. FIRE DRILLS

- We do not operate any commercial premises; staff all work from their own homes. We do, however, work at the premises of employers when we are training or coaching apprentices. The instructor on site is responsible for ensuring that he/she and all learners are aware of the local evacuation procedures. The instructor should liaise with the employers after each evacuation to review the success or otherwise of the evacuation and to make recommendations for improved practices.
- The instructor is responsible for removing obstructions from fire exits.
- The instructor is responsible for ensuring that all staff, including learners, are fully familiar with the local fire drill procedure, escape routes and the assembly point.

11. Universal Hygiene Controls

Our employees are responsible for hygiene when working from home. Where we work away from our residences, we will seek to ensure that

- All areas are kept clean and tidy.
- Toilets are washed regularly and kept clean.
- All wash basins are provided with hot water, soap, clean paper towels or hand dryers.
- Vending machines for sanitary products and disposal bins are provided. Bins should be emptied and sanitised regularly.

12. First Aid and Accident Reporting

a. First Aid

- First Aid provision will be available at all times in appropriate and accessible First Aid Box(s).
- All new employees will be told as part of their induction of the location of first aid equipment (or provided with a First Aid kit if they are working from home) and the employees who have received first aid training.
 - A record of all first aid cases treated will be kept in the Accident Book, which is kept by the Competent Person. Our own accident book is located on our shared drive: within our Dropbox, UK Team\Apprenticeships\Policies & Procedures\Policies and Procedures Approved \Accident Book.xlsx

b. ACCIDENTS AND EMERGENCIES

- All employees must report to their line manager all incidents which actually or nearly resulted in personal injury to themselves or others, and ensure the accident is recorded in the Accident Book.
- It is the responsibility of the competent person to ensure that any necessary follow up action is taken to reduce the risk of the accident or near accident reoccurring.
- The competent person is responsible for reporting incidents which come within the Reporting of Injuries, Diseases & Dangerous Occurrences Regulations (RIDDOR). RIDDOR covers the following incidents:-
 - (a) Fatal accidents
 - (b) Major injury accidents\conditions
 - (c) Dangerous occurrences
 - (d) Accidents causing more than 3 days incapacity for work
 - (e) Certain work-related diseases.

13. COSHH

a. GENERAL STATEMENT

- Under the 2002 COSHH (Control of Substances Hazardous to Health) Regulations, employers have a duty to make an assessment of the risks related to hazardous substances e.g. chemicals, noxious fumes etc. In accordance with the Approved Code of Practice this assessment will be carried out and written down by the nominated competent person.
- Following this assessment, in accordance with the Approved Code of Practice (ACOP) we will:
 - (a) In the first instance take action to **remove** any hazardous substances
 - (b) If this is not possible then action shall be taken to find a **substitute** for the hazardous substance
 - (c) If this is not possible such substances shall be **enclosed** within a safe environment
 - (d) If none of the above is possible, **protective equipment** will be issued to ensure the safety of staff.

b. MONITORING

- If for any reason a member of staff has to be exposed to a possibly hazardous substance, levels of exposure will be monitored.
- At all times levels of ill-health related to exposure to hazardous substances at work will be monitored.

c. REMOVAL, SUBSTITUTION, ENCLOSURE AND PROTECTION

- All members of staff shall avoid using hazardous substances at all times if at all possible. Where substitute materials are available they should be used (e.g. water based markers, correction fluid etc). If there is no way of avoiding use of a hazardous substance, then staff must use the substance in an enclosed, ventilated environment away from other workers, and use proper protective equipment, which shall be made available by the business.

14. MANUAL HANDLING

- Employees should avoid manual lifting where at all possible. However, employees may occasionally be required to manually lift and handle loads. Correct manual lifting and handling reduces the effort required and prevents strain and risk of injury.
- The most likely occurrences of manual handling for our employees are:-
 - the receipt and storage of stationary orders
 - moving paper records into archive storage
 - rearranging the office furniture and equipment
 - handling loads at outside events.
- All employees should use aids which are available to reduce the risk of injury, e.g. sack trolleys etc.
- Employees should not put themselves at risk by attempting to lift heavy loads which could be divided into smaller quantities. The assistance of other employees should always be sought for moving large quantities or for lifting heavy and awkward loads. When lifting in a team take instructions from one person only.
- Any employee feeling a strain should stop immediately and record the incident in the Accident Book. To continue may result in more serious injury.

15. STRESS MANAGEMENT

- We will do all we can to eradicate problems relating to stress at work. In particular we will:
 - Ensure close employee involvement, particularly during periods of change.
 - Give opportunities for staff to contribute in the planning and organisation of their own jobs.
 - Ensure staff have work targets that are stretching, but reasonable.
 - Implement effective policies and procedures for dealing with bullying and any form of harassment
 - Encourage good communications between staff and management.
 - Promote the maintenance of a supportive culture in the workplace.
 - Where appropriate, take into consideration an employee's personal problems/problems at home.
 - Ensure employees avoid working long and unsocial hours.
 - Keep in regular contact with employees working from home, to make sure they are healthy and safe.
- We will ensure that all policies, working practices, conditions of employment etc. do not contradict with the above statement.
- Employees should become aware of the causes of stress, and ensure that they do not work in a way which could cause them to suffer an increase in stress, nor cause an increase in stress on others.
- Employees must respect other members of staff, and ensure that interpersonal conflicts are avoided or dealt with sensibly.
- Employees must not make unrealistic demands of other workers, by imposing impossible deadlines and/or increasing others' workloads to a level they cannot cope with.
- Employees should participate with our intention to maintain a co-operative and supportive workplace environment.
- If an employee is suffering from stress at work, they should discuss this with their line manager in the first instance or any other manager at the first opportunity. Where practicable and reasonable, we will seek to provide assistance to the employee.

16. COVID Precautions

- While there is an active risk posed by COVID, we will do our work remotely unless face-to-face meetings are specifically required by our clients. Partner approval is required for any work not performed remotely.
- Employees should respect current prevailing Government advice on social distancing, mask wearing and hand washing
- Until we own business premises, we will not be responsible for cleaning premises but employees/Partners have a duty to bring unsafe/unclean practices to the attention of those responsible locally.
- Good ventilation (including air conditioning) can help reduce the risk of spreading coronavirus. When meeting indoors, we must take every possible step to improve ventilation while maintaining a comfortable temperature in your workplace.

- Full information about COVID precautions can be found here: <https://www.hse.gov.uk/coronavirus/working-safely/index.htm>. This website should be used as the reference point for any situations where we are not able to work remotely and need to minimize risks in an office environment.



David Hampton
Partner
5 August, 2021