# ­HEALTH AND SAFETY POLICY GUIDANCE

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# FOR INTERNAL USE ONLY

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# Introduction

## 1.1 Introduction to guidance paper documents

Sitting alongside this Health and Safety Policy Framework document are a number of single-issue procedural documents that provide guidance on the expected behaviours, actions and responsibilities for a number of specific topics.

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# HS01 – General Safety

## 2.1 Office Safety

The company will ensure that measures are taken to reduce hazards created by poor housekeeping standards to ensure all employees, learners, contractors and visitors are provided with a safe and healthy working environment. Office employees, learners and contractors must assist in minimising the risk of accidents, ill health and fire through their actions.

The Facilities Department will carry out Risk Assessments for general office hazards and these will be available to employees on Iris HR Cloud

Everybody has a responsibility for ensuring general safety and the health and safety of themselves and others, which includes but is not restricted to the duties detailed below:

* Ensure that hazards are minimised by properly storing materials, limiting trailing cables, closing filing cabinet drawers and keeping staircases and fire exits clear at all times.
* Walkways and exits will be free from obstruction at all times and clearly identified safe exits will be provided.
* All areas are regularly clean, tidy and free from a build-up of waste.
* Items will be stored so that they do not pose a risk of fire or other hazards.
* Risk Assessing hazardous tasks and other tasks and using safe methods of work.
* Each Route will ensure that any chemicals or hazardous substances are notified to the Facilities Department for Risk Assessment prior to use.
* Fire Hazards are to be minimised by keeping fire doors closed, fire extinguishers in place and reducing the build-up of paper and other flammable waste.
* Ensure that there is no smoking anywhere on sites except for the designated smoking area(s)
* Ensure that electrical hazards are minimised by ensuring that all cable connections are sound, and that sockets are not overloaded.
* All employees are to ensure that portable electrical equipment is available for regular checking and taken out of service if a fault is identified or suspected.
* It is a requirement that all employees, learners and contractors will receive mandatory general site safety information on their first day. It will be the responsibility of all managers to ensure that this has been undertaken and understood, and that they are made aware of this policy and all associated documents linked to it. It should be noted that some of the Policy Technical Guidance may not apply to certain work situations. Equally, there may be some work situations not covered by this guidance in which case it will be the manager’s responsibility to ensure that an assessment is undertaken for associated hazards and risks, and introduce control measures.

## 2.2 Fire and Emergency Procedures

The company recognises the dangers that can arise in the event of fire, and will ensure measures are in place to ensure compliance with the [**Regulatory Reform (Fire Safety) Order 2005**](http://www.legislation.gov.uk/uksi/2005/1541/contents/made)

The company will provide all employees, learners and contractors with induction training to include fire and emergency procedures and ongoing mandatory training as required ensuring that all are fully aware of actions to be taken in an emergency evacuation or fire. Strategically placed notices and instructions that describe emergency procedures in the event of an evacuation are available in all centres, and clearly indicated exit routes are in place. Information for all building emergency evacuation procedures and Fire Risk Assessments will be available on the tree.

A Fire Risk Assessment for each centre will be carried out annually, or upon any significant change which will detail the following for each site:

* Fire Procedure and Emergency Response/Evacuation Team
* Details of Fire detection, Emergency Lighting, Fire Fighting Appliances etc.
* Identification of any sources of ignition which may cause a fire
* Identification of people at significant risk
* Identification of any structural features which could promote, or control the spread of fire
* Notes of building inspections and any actions required.

In general, it is the company policy that:

* Waste will be controlled and should not be allowed to accumulate to levels that could increase the risk of fire
* Fire Fighting and detection equipment provided in accordance with guidance and shall be inspected and tested regularly. All records are to be held by the Facilities Department.
* Emergency lighting shall be provided throughout all areas and ensure the safe evacuation of all employees and visitors in case of power failure. Emergency lighting will be inspected and tested regularly. All records are to be held by the Facilities Department.
* All ACT Centres will be non-smoking areas and the use of any naked flames (Candles, cigarette lighters or matches) is controlled and risk assessed as necessary.
* The company will hold a suitable number of trained employees to act in an emergency evacuation. Training will include emergency evacuation procedures and clearly identified roles and responsibilities. Training records and renewals are held in the P&D Department.
* Clearly defined Evacuation procedures will be held for all centres including fire assembly areas. All employees should be aware of where they report to in the event of an emergency evacuation and what is expected of them including Fire Assembly Points and reporting procedures.
* Emergency Evacuation exercises will ideally be undertaken every 6 months, but at least annually for each location. Failures and improvement recommendations are to be recorded and actioned. In locations with Schools these evacuation exercises will be carried out every term (3 per year)
* All employees, learners and contractors shall ensure that they must under no circumstances place themselves or others at risk in any fire or emergency evacuations. They should follow safety procedures and await instruction from the emergency evacuation team.

# HS02 Hazardous Substances (COSHH) and Legionella

The Control of Substances Hazardous to Health (COSHH) Regulations 2002 requires that a Risk Assessment is undertaken for all chemicals and substances used in the workplace. It is a requirement that, where reasonably practicable, no substances are to be used on site until a Risk Assessment of each substance has been carried out. Company obligations are set out within the HSE’s [***Approved Code of Practice for the Control of Substances Hazardous to Health***](http://www.hse.gov.uk/pubns/books/l5.htm)

Detailed arrangements required for the control of Legionella are set out within the HSE’s [***Approved Code of Practice (L8) – Legionnaires Disease: The Control of Legionella Bacteria in Water Systems.***](http://www.hse.gov.uk/pubns/books/l8.htm)

## 3.1 Control of Substances Hazardous to Health (COSHH)

Obligations

## Facilities Department

The Facilities Department undertakes annual Risk Assessments for all known substances in use on all sites. If materials are classified as hazardous, the substance is risk assessed, and if possible, eliminated or substituted for a safer product if available.

## Contractors and Suppliers

All contractors shall be required to provide an annual COSHH return document and provide details of all substances used on site along with copies of manufacturers Material Safety Data Sheet (MSDS). The Facilities Department will then risk assess all substances used on site and may request investigation into the use of safer alternatives if reasonably practicable.

## Regional Managers

Regional Managers shall be responsible for ensuring that an annual COSHH return document is completed and supplied to the Facilities Department. The Facilities Department will then ensure that all necessary Material Safety Data Sheet (MSDS) and Risk Assessments are undertaken and any substances are added to the COSHH register. Regional Managers will be responsible for ensuring that any contractors working under their control provide details of substances to the Facilities Department.

## Employees

Employees shall be provided with information relating to hazards of materials to be used or encountered as part of their role and instructed in the safe working methods with training, where necessary, to be able to follow safe working practices. Employees shall comply with instructions issued and cooperate with the company in any monitoring exercises.

## Record Keeping

All substances will be maintained on a register held and managed by the Facilities Department and stored safely in accordance with manufacturer’s recommendations. Where substances posing risk to health are used, these will be stored with paper copies of Risk Assessments which includes information on Storage, Risks to health from exposure, First Aid treatment handling requirements along with a copy of the manufacturers Material Safety Data Sheet (MSDS).

Health surveillance shall be undertaken for higher risk substances and undertaken for specified employees & learners. Employees & learners concerned shall be identified on merit and be required to cooperate with any provisions.

Where any health monitoring or surveillance is required, records will be held for a minimum 30 years.

## 3.2 Legionella

The company will maintain its water systems to prevent the growth of legionella bacteria and as required by the [**Approved Code of Practice (L8)**](http://www.hse.gov.uk/pubns/books/l8.htm), ensure that Water Risk Assessments are undertaken on a regular basis and implement effective management arrangements.

## Risk Assessments and Management Arrangements

The Facilities Manager has been appointed as the company “responsible person” for the prevention of legionella growth and responsible for ensuring that effective legionella management is implemented. This includes ensuring a suitably competent and qualified water company undertake a risk assessment of both hot and cold water systems and air conditioning equipment for identifying any legionella risks. These risk assessments shall be reviewed periodically or where any change may invalidate the assessment.

## Routine testing and maintenance

Routine testing and maintenance will be undertaken in accordance with the findings of Risk Assessments. This will include regular checking of tap temperatures, descaling and cleaning of water equipment (including showerheads) and regular flushing of outlets not in regular use.

## Responsibilities

The overall management of the control of legionella will sit with the Facilities Manager.

The day-to-day review of legionella risks and risk assessments shall be managed by the Facilities Manager. Maintenance is to be carried out by the Appointed Water Safety contractor and our onsite maintenance team.

All alterations to plumbing are to be undertaken by trained contractors to ensure compliance with the [***Water Supply (Water Fittings) Regulations 1999***](http://www.legislation.gov.uk/uksi/1999/1148/contents/made)***.***

## Records and Reporting

Records of testing and maintenance listed above shall be maintained by the Facilities Department.

Testing logs and Risk Assessments are to be kept up-to-date and readily available for inspection. In the unlikely event of any employee, learner, contractor or visitor contracting legionellosis or the release of legionella bacteria, the company will make any statutory reports under the [***Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013.***](http://www.hse.gov.uk/riddor/)

# HS03 Asbestos at Work

## 4.1 Control of Asbestos

The company is aware of its legal obligations under the [**Control of Asbestos Regulations 2012**](http://www.hse.gov.uk/asbestos/regulations.htm) and the legal duty to manage the risk from Asbestos Containing Materials and the [**HSE Approved Code of Practice**](http://www.hse.gov.uk/pubns/books/l143.htm)**.**

In order to meet its obligations and ensure a safe and healthy workplace, the company has adopted the following procedures in relation to the control of Asbestos in the workplace:

* The Facilities Manager has been appointed as the company “responsible person” for management of Asbestos for all buildings and equipment for which there is not a clear report indicating that they are ‘Asbestos Free’, partially prevalent for buildings built or refurbished between 1950 and 1980.
* The Facilities Manager will ensure that detailed surveys are carried out where there is the potential risk of asbestos prior to any work. This is if the results of any previous survey are not available to establish the location, form, type and condition of any asbestos together with an evaluation of the likelihood of the material being damaged or affected in the future.
* An Asbestos register is to be maintained recording the survey results of each building/work area and this register will be made available during any maintenance, repair or alteration works are considered.
* Asbestos containing materials shall be labelled and subject to regular and documented inspection, and any maintenance carried out is to be completed to minimise the risk of fibre release where applicable.
* All works on asbestos, except for very small quantities of asbestos cement, pump seals, vale seals or flanges shall be carried out by licenced contractors under the independent supervision of an accredited monitoring agency.
* All works on, or to remove materials known to contain asbestos must be undertaken by a specialist company commissioned to protect and remove asbestos from site. This will be done under the instruction of the Facilities Manager co-ordinating safety arrangements.
* In addition to removing asbestos identified as representing, a significant risk (because of its condition, location, etc.) the opportunity shall be taken during any maintenance or refurbishments to gradually remove all asbestos from the company sites.
* Waste contaminated by, or containing asbestos, shall be double bagged, labelled and disposed of in a licensed site as special waste, and the disposal paperwork retained in the Company records. Disposal must be carried out in accordance with the Control of Asbestos at Work Regulations 2012.
* For significant works, monitoring and air sampling before and after completion must be carried out as prescribed by the Health and Safety Executive (HSE). Upon completion of work the area must comply with statutory regulations and a ‘Clean Air Certificate’ using the ‘Distrusted Air Method’ must be issued.
* The company will undertake due diligence on any 3rd party contractors working on behalf of ACT Training to ensure that all contractors comply with the *Control of Asbestos Regulations 2012*.

The day-to-day reviewing of Asbestos risks and risk assessments will be managed by the Facilities Manager. Maintenance is to be carried out by the company-approved contractors.

All works to Asbestos is to be carried out by licenced contractors to ensure compliance with the regulation. **Employees/Learners must not at any time, work with or remove materials containing asbestos; this includes the stripping of lagging or any type of material which may have an asbestos content.**

# HS04 First Aid and Accidents

The company recognises that it has a responsibility towards employees, learners, contractors and visitors on our site to provide treatment and to minimise the consequences of illness or injury until medical or nursing help is available in line with the requirements of the [***Health and Safety (First Aid) Regulations 1981***](http://www.hse.gov.uk/pubns/books/l74.htm).

## 5.1 First Aid

## First Aider Coverage

ACT Training will maintain a register for selected employees to be trained as “First Aiders” with training and refresher training conducted by competent persons in accordance with the guidance set by the [**HSE Selecting a First-aid Training Provider**](http://www.hse.gov.uk/pubns/geis3.pdf)

First Aid arrangements will be made aware to all employees and learners by means of initial employee induction and regular annual training. This will include the provisions of first aid supplies and emergency contact details.

Records of all training certificates and expiry dates will be maintained by P&D and shared with the Facilities Manager

COVID 19 guidance has been issued to all first aiders to ensure they are protected as best we can during the pandemic. The first aiders will try and issue first aid treatment from a safe distance initially with the injured person being given advice on self-care. In instances where this is not possible, the first aider will need to wear and use all relevant PPE.

## Supplies & Training

A minimum level of first aid equipment will be held in stock at each location in a suitably robust container and clearly identifiable and accessible. The stock levels will be checked periodically and replenished as required. First Aiders are responsible for ensuring the boxes are fully stocked.

All first aiders are to be made aware of the risk of disease transmission through bodily fluids, including HIV and Hepatitis B. During any first aid treatment, care should be taken to avoid infection. Appropriate barriers should be used and available in first aid kits to deal with this possibility.

Transporting of learners to hospital

If parents are unable to accompany the ambulance, a member of staff known by the learner, will follow by car and meet parents in the Accident and Emergency Department. A member of staff may need to travel in the ambulance with the injured learner. In these circumstances, arrangements will be made by the Senior Management Team to organise collection of this staff member once the parents have arrived at the hospital.

Disposal of Clinical Waste

Any waste which contains or is contaminated with human blood, body fluids or excreta is defined as clinical waste. Its safe disposal is necessary to protect staff and others who may come into contact with it against the risk of infection, to prevent contamination of the environment and to ensure compliance with the Environmental Protection Act. The Environmental Protection Act places a duty of care on waste producers to ensure that it is disposed of properly. The appropriate means of disposal for clinical waste will depend on the level of risk (e.g., waste contaminated with blood would be at greater risk than incontinence waste) and the amount produced.

In the event of contact with blood or other bodily fluids First Aiders should take the following precautions to avoid risk of infection:

* wear suitable disposable gloves (and aprons etc) when dealing with blood or other bodily fluids;
* use devices such as face shields, where appropriate, when giving mouth to mouth resuscitation;
* wash hands after every procedure.

Medical Dressings and first aid materials- If regular large quantities of medical dressings and first aid waste are produced, it should be disposed of by incineration via a licensed contractor. Very small amounts of first aid which are produced irregularly may be double wrapped and disposed through normal waste unless it is known to be from an individual with a higher risk of infection.

All Medical waste needs to be put in the Yellow Medical waste bags that are provided at each site. The Facilities Team should be contacted to arrange disposal of this waste.

Sickness

Learners should not attend schools or centres if they are unwell. It is important that the learner or their parents/carer notify their tutors of their absence. Please telephone the centre attended on the first day of absence and keep us informed on an ongoing basis. The school must be advised of any infectious diseases that could be passed on to other learners. If the illness is long term, please contact the tutors to advise on the length of expected absence.

Learners who are genuinely ill during lessons should be sent to the Centre Managers Office and a parent or carer is contacted. They should be looked after in the Managers Office or first aid room until the parent/carer arrives. The learner will be kept under close supervision and kept as comfortable as possible.

The Facilities Manager obtains an annual update on childhood/infectious diseases and ‘exclusion’ times for reference.

Parents/Carers have the prime responsibility for the health of learners and must provide annual/up to date information about the learner’s medical conditions by completing

a confidential Personal and Medical Information Form (including allergies, vaccinations etc) with emergency telephone numbers. This form is found within the ACT Schools induction pack. All information is then stored on a central register. Parents/Carers have the responsibility to advise the ACT Centre of any changes to this information during the learner’s time with us.

Medical Conditions

Most people will need medication at some time in their life. Although this will mainly be for short periods, (e.g., to finish a course of antibiotics), there are a number of pupils with chronic/allergic conditions, who may need regular medication throughout all/part of their life. It is often possible for parents/carers to arrange for medication to be taken outside learning hours; however, there will be circumstances when it will be necessary for learners to be given medication during the day.

The Facilities Department will work with the Learner/Parent/Carer to create a risk assessment based on the needs of the learner. Detailing in the Risk Assessment how often medication needs to be taken, emergency arrangements and any other relevant details staff and first aiders need to be aware of to help the learner remain safe while learning with us.

Any medication kept by ACT on behalf of the learner will be labelled and stored in a locked cupboard or a locked box in a fridge. Any controlled medication will be stored in a medical safe in a locked room. All medicine issued to learners will need to be logged. The log will contain the following information.

* Learners Name
* Issuing Staff Members Name
* Date and time of issue
* Name of medication
* Amount of medication issued
* A note if a parent/carer needs to be informed (Not in all cases)

Some learners may suffer from conditions such as Diabetes or Anaphylaxis, and in some cases may require the administration of life saving medication in an emergency. Following completion of the Risk Assessment, ACT First Aiders will be trained to administer medication in these life-threatening circumstances. The Risk Assessment in place for that Learner will give details on what should happen after an episode so that parents/carers are notified along with emergency services where necessary.

Medicines no longer required must be handed back to the parent/carer or destroyed.

## 5.2 Accident, Near Miss and Incident Reporting

Records of any accident, incident or near misses, however minor, are to be recorded using the ACT Training “First Aid & Incident Form” which is to be completed by the reporting person/first aider dealing with any incident. These reports are to be filed by the Facilities department forming the Accident File and any investigations/actions required will be conducted by the Facilities Department with the assistance of compliance where required. Records should be maintained for a minimum period of 3 years.

Records of any accident, incident or near miss should always include:

* Date, time and place of the incident
* Name and job/course of the injured or ill person
* Details of any injury/illness sustained and details of any first aid treatment provided
* Details of what action was taken immediately afterwards (i.e. treatment, return to work, attended hospital etc.)
* Name of the first aider or person dealing with the incident.
* Details of any witnesses (if applicable) and to obtain witness statements

Information provided can assist in identifying any trends and possible areas for improvement in the control of health and safety risks.

[***Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) 2013***](https://www.hse.gov.uk/riddor/) will be undertaken by Facilities in conjunction with P&D and Compliance. The requirements for reporting under RIDDOR will be carried out in line with the regulation requirements.

Serious accidents will be notified to the Operations Director, Managing Director and CEO by the quickest appropriate manner.

# HS05 Risk Assessments

## 6.1 Risk Assessments

The company recognises the legal obligation to assess hazards contained or created by its business activities and to undertake a Risk Assessment to reduce known hazards to an acceptable level to meet its responsibilities under the Managing for Health and Safety [**Approved Code of Practice HSG65.**](http://www.hse.gov.uk/pubns/books/hsg65.htm)

The company shall aim to achieve a low risk working environment where possible and ensure that all activities are subjected to thorough Risk Assessments. It is the responsibility of Regional Managers and Route Managers to ensure that Risk Assessments are communicated to all employees and learners.

Risk Assessments should aim to use a standardised formula to allow consistency in assessing risks and hazards and in all cases should consider individual circumstances relevant to the assessment being undertaken or task.

Risk Assessments should be recorded and communicated to the relevant group of employees and learners and all affected by the Risk Assessment should be made aware of the control measures detailed in the assessment.

Risk Assessments should be used to support a positive safety culture in the management and control of Health and Safety in our centres. Procedures are in place to promote safer working conditions. The responsibility for completing task-specific Risk Assessments will usually be the centre manager or manager responsible or another competent person. It is important for those involved in the task to be involved and consulted and Risk Assessments should be reviewed regularly when there is a change in process but at least annually.

## Review

Risk Assessments should be reviewed either:

* Annually
* When there is reason to suspect the assessments are no longer valid (i.e., in the event of accident)
* When there is a significant change to matters to which the assessment relates (i.e., introduction of a new process or equipment)

## 6.2 Method Statements

In support of Risk Assessment findings, it may be required that certain activities may require the development of Method Statements to clearly outline the manner in which activities are carried out, any special arrangements in place or PPE required for certain tasks.

Method Statements will be required for specific hazardous work tasks and must be produced by competent persons with knowledge, experience and understanding of the task undertaken. Method Statements will detail step by step operations, known hazards and measures taken to reduce risk.

3rd Party Method Statements are to be reviewed and accepted by the responsible manager or competent person and are to be checked for accuracy and sufficient detail before being accepted and attached to the relevant work instruction/permit to work.

## 6.3 Personal Protective Clothing and Safety Equipment (PPE)

The company will ensure that suitable PPE is available to employees & learners as required to control risks identified in any Risk Assessments.

PPE should be provided at no cost to the employee or learner. Employees & learners are required to ensure items are used as instructed, not tampered with or modified in any way, and any defects are reported as soon as possible. PPE required should be identified in Risk Assessments such as those for task specific Task Risk Assessments or COSHH Risk Assessments.

PPE required by employees or learners may include, but not limited to:

* Eye protection where there is a foreseeable risk of eye injury from work activities
* Ear protection where there is a risk of injury identified
* Gloves used during the handling of abrasive, corrosive or other potentially harmful substances or gardening/maintenance duties.
* Respiratory Protection where there is foreseeable risk of significant exposure to airborne harmful substances
* Protective Clothing
* Protective footwear

## 6.4 Control of Noise at Work

The Noise at Work Regulations 2005 require that an assessment where it is anticipated that noise levels are expected to be 80dB (decibels) or more.

Where areas are identified, the company must adopt reasonable measures to reduce noise levels to the lowest reasonably practicable.

Requirements for action:

* Lower exposure Level – 80dB average (Peak 87dB)
* Limit value – 137dB average (Peak 140dB)

There are some route-based learning where power tools or engines running would go over recommended exposure limits. Ear protection PPE is provided to those working in those areas.

## 6.5 Electricity

The company recognises its responsibilities to protect the risk to employees, learners and contractors from exposure to electricity through Risk Assessments, Method Statements of work and using appropriate Work Permits.

All work equipment, including electrical items will be suitable and sufficient. Testing of Portable and Fixed Electrical installations is to be carried out at industry recommended intervals.

Subject to work arrangements, the company may require contractors to provide testing certificates or inspection reports for electrical work equipment.

Where electrical equipment is used that poses hazards to health, only trained authorised persons may use equipment and shall ensure it is free from visual defects and in good working order prior to use.

All work on live, or high voltage electrical equipment must be supported with a relevant Work Permit and supporting Electrical Work Permit **before** work takes place. All Risk Assessments, Method Statements must be reviewed in detail to ensure that control measures are in place to manage the risks from electrical works.

## 6.6 Working at Height

ACT Training recognises its responsibilities to protect anyone whilst undertaking work at height. The company shall ensure that work undertaken is compliant with the [***Work at Height Regulations 2005***](http://www.legislation.gov.uk/uksi/2005/735/contents/made) and ensure that work equipment is used to prevent falls where work at height cannot be avoided, and use appropriate equipment to minimise distance and consequence of a fall where the risk of a fall cannot be completely eliminated.

The company will ensure that:

* All work at height is properly planned and organised
* All work at height takes into account current conditions (i.e., weather) as well as the knowledge, training and experience of operatives.
* All work at height is undertaken with the necessary Risk Assessments, Method Statements and Work Permits having been provided, reviewed and accepted.
* All learners working at height are supervised at all times while working at height.
* All third-party contractors undertaking work from height are properly trained and competent and use work equipment/structures are appropriate, inspected and safe for use.
* Risks from falling, falling objects and fragile surfaces are properly controlled.
* If conditions on site (i.e., weather) will endanger the health and safety, work must be postponed until it is safe to proceed.
* Emergency plans are in place, and clearly defined procedures for rescue and first aid are identified and communicated to all relevant persons.
* All access equipment is inspected and maintained in accordance with manufacturer’s instructions and current legislation, and the company may request to view records of testing and inspections of 3rd party access equipment including scaffolding, lifting platforms and ladders.
* Operatives working on fragile surfaces will be provided with suitable platforms and guarding to eliminate or minimise the risk of a fall.
* Operatives shall do all that is reasonably practicable to prevent falling objects which includes not throwing or tipping materials from height where there is a risk or injury, or store materials at height where there is a risk of falling which is likely to injure someone.

**Working areas will be clearly identified to prevent unauthorised access and prevent injuries from falling objects.**

# HS06 Control of Contractors and Permit to Work

## 7.1 Control of Contractors

The company will, so far as reasonably practicable, ensure due diligence and a robust procurement process for third party contractors carrying out work on behalf of ACT Training. Prior to awarding work the company will require from potential contractors evidence that they are aware of their legal obligations towards health and safety and have measures in place to manage, monitor and report on health and safety risks.

In cases where contractors are required to carry out works on the company’s sites, selected contractors shall be required to demonstrate good Health and Safety and Environmental management practices, by supplying a copy of the company’s own Health & Safety Policy, sample Risk Assessments and Method Statements, and other relevant documentation either as part of the tender selection process.

The manager instructing or responsible for work taking place will hold responsibility to ensure that all due diligence checks are completed, and that all contractors working on site have received a mandatory contractor site induction work safely, including safeguarding the environment and where required issue relevant [**permits to work**](file:///C:/Users/msg/AppData/Local/Microsoft/Windows/Temporary%20Internet%20Files/Content.Outlook/AppData/Local/Microsoft/Windows/Temporary%20Internet%20Files/Content.Outlook/AppData/Local/Microsoft/Windows/Permits%20to%20Work/PERMIT%20TO%20WORK%20SYSTEM.xlsm).

## Contractor Selection

The requirement for basic health, safety and environmental information should be required as part of any tender process to ensure that all contractors are aware of, and fulfil their obligations. It should be required that contractors who fail, or refuse to provide basic information have this considered as part of the selection process. Under certain circumstances more detailed information may be a requirement of contractor selection where there are significant or increased Health and Safety risks.

## Approval of Contractors

It shall be the responsibility of the manager or nominated representative to assess the responses from contractors in relation to competence and the level of Health, Safety and Environmental information supplied. Where managers feel they are not confident or competent to assess this information, they must seek advice from the Facilities Department or other competent persons.

Health and Safety information, usually in the form of Risk Assessments and Method Statements shall be provided and reviewed before any work is carried out. The manager will require the contractor to submit Method Statements and Risk Assessments which must be reviewed and approved with additional information requested if necessary. Under no circumstances must work commence unless an assessment of significant risk has taken place and control measures identified.

Managers will maintain records of all contractors and Environment, Health & Safety information for auditing.

## Contractor Induction

Prior to contractors commencing work, the manager or their nominated representative shall ensure that all contractors have received appropriate work permits and received a mandatory contractor site induction.

A record of [**Work Permits**](file:///C:/Users/msg/AppData/Local/Microsoft/Windows/Temporary%20Internet%20Files/Content.Outlook/AppData/Local/Microsoft/Windows/Temporary%20Internet%20Files/Content.Outlook/AppData/Local/Microsoft/Windows/Permits%20to%20Work/PERMIT%20TO%20WORK%20SYSTEM.xlsm), risk assessments and method statements should be held by Manager’s, a copy should also be sent to the Facilities Manager

## Contractor Induction

Contractors must ensure that the company Health and Safety rules are followed at all times, and the manager/nominated represented shall monitor compliance and immediately suspend work if there is a risk to the health and safety of any employee or contractor working on behalf of the company.

## 7.2 Permit to Work System

The company will ensure that safe systems of work are controlled through the implementation of a Permit to Work system. The Permit to Work (PTW) documents will detail the work to be undertaken and any precautions specified to prevent danger.

Work permits are to be issued for all contractors working on all company sites and are to be issued and managed by the instructing manager/department.

Work Permits can be found on SharePoint (Operations, Health and Safety, Permit to Work System.

## Requirements

Work Permits are required for directly appointed contractors working on behalf of the company undertaking any activity on any ACT Training site. Subcontractors may be included within the main contracting party’s work permit and the main contractor is to ensure that all of their sub-contractors adhere to the work permit and approved health and safety rules.

Where Work Permits are required, these may only be issued upon receipt and acceptance of any applicable Risk Assessments, Method Statements and other required documentation. Responsible Managers must use their judgement when issuing or instructing work requiring a Permit to Work and ensure that the correct control measures are used. The manager responsible for issuing work will review the Health and Safety documentation of the contractor prior to issuing a work permit and may request assistance from the Facilities Department if there are any areas of uncertainty.

The Manager must ensure that they are satisfied the person receiving the Permit has read and understood and read the contents.

The contractor receiving the Permit is then responsible for ensuring that all of the conditions and instructions are observed and that all contractors/subcontractors working on their behalf comply with the permit whist it remains active.

## Types of Work Permits

* **Single Access Permit**

Single Access work permits are to be used for ad-hoc works or works where there is a significant risk requiring additional checks (i.e., use of any additional work permit).

* **Term Access Permits**

Term Access Permits are permitted for repeat contractors carrying out low risk work on a regular basis (for example regular maintenance works, or regular low risk repairs). Contractors with Term Access permits may require the use of Single Access or Additional work permits where there are works taking place posing increased hazards.

* **Additional Work Permits**

Some work will require the use of additional work permits to sit alongside Single Access permits where there is an increased risk in activities or particular works taking place. These include:

* Working at Height
* Electrical Work
* Work near, or on areas containing Asbestos
* Hot Works
* Entry into confined spaces
* Works involving excavations

**The above permits may only be issues by the Facilities or Compliance Manager**

## 7.3 Construction (Design and Management) Regulations 2015

The company recognises its legal obligations under the [**CDM Regulations 2015**](http://www.hse.gov.uk/pubns/books/l153.htm) and will ensure that where required, procedures are in place to ensure that construction and refurbishments, and other projects where CDM apply will be undertaken in line with the regulatory requirements.

# HS07 Manual Handling, Lifting and Work Equipment

## 8.1 Manual Handling

The company recognises its responsibilities under the [**Manual Handling Regulations 1992**](http://www.hse.gov.uk/pubns/books/l23.htm) and [**HSE Guidance**](http://www.hse.gov.uk/pubns/indg143.pdf)the requirement to ensure that all employees, learners and visitors are provided with a safe and healthy working environment.

Managers are required to Risk Assess all Manual Handling activities within their area and determine whether or not hazards can be eliminated, reduced (by a change or practice or working habits) Automated (using mechanical aids/techniques) or if employees require formal Manual Handling Technique training.

All managers should carry out Risk Assessments of activities used in their area to determine the best way to reduce and manage risks associated with Manual Handling Activities.

## Elimination

The Manual Handling Regulations require that where possible, work processes should eliminate the need to undertake manual handling activities where reasonably practicable to do so. This could be a review of the task requirement and a determination if it is required.

## Reduction

Where possible, risks from Manual Handling activities should be reduced to the lowest reasonable level, which may involve changing work practices, reducing task requirements etc.

## Automation

Where manual handling activities are required, consideration should be given to the use of mechanical aids to reduce the risk of injury

## Training

Where identified by managers, employees expected to undertake Manual Handling activities should undergo regular training. Employees expected to undertake training as requested by their manager should ensure they follow the processed put in place by the company.

## 8.2 lifting Equipment

In order to comply with the [**Lifting Operations and Lifting Equipment Regulations 1998**](http://www.legislation.gov.uk/uksi/1998/2307/contents/made), the company will ensure safe systems of work for all lifting equipment.

Lifting equipment used within ACT Training is limited to the following items:

* Passenger lift cars
* Roller shutter doors.
* Hydraulic car lifting equipment

This will include, but is not limited to

* Ensuring that all lifting equipment purchased is covered by an appropriate “Certificate of Inspection” and marked as a safe working load with a unique identifier.
* A register of all lifting equipment will be maintained by the Facilities Department/Compliance Manager.
* All lifting equipment will be subject to formal regular inspection by an independent competent person at least every 6 months and records are to be retained for not less than 2 years.
* Upon notification of the report of any defect or damage, the Facilities Department will immediately remove any lifting equipment from service pending inspection and repair.

In circumstances where lifting equipment is to be used and is not listed above additional Risk Assessments of the operations will be carried out before work is carried out.

Specialist crane or lifting operations will be carried out by specialist contractors under contract. These specialist contractors will need to provide Risk Assessments and obtain the necessary work permits before works are carried out.

## 8.3 Work Equipment

The company recognises its responsibilities under the [**Provision and Use or Work Equipment Regulations (PUWER) 1998**](http://www.legislation.gov.uk/uksi/1998/2306/contents/made) to ensure that all equipment supplied for use by employees is suitable and sufficient. This applies to machinery, appliances, apparatus or work tools used for work.

When determining the need for work equipment, the manager or nominated representative will assess the nature of work to be carried out and ensure any work equipment required is suitable and fit for purpose.

Where required, managers will seek advice or assistance from the Facilities Department to ensure compliance or reviewing documentation on health and safety.

Where machinery or plant is used that poses hazards to health, only trained authorised persons may use equipment and shall ensure it is free from visual defects and in good working order prior to use.

## 8.4 Vehicles

The company recognises the danger to employees and members of the public in relation to the operation and use of company vehicles, and personal vehicles used for company business. The company will manage risks for Occupational Road Risks and Driver Safety to ensure that all vehicles used for company business are safe, maintained and that drivers are aware of the company policy on driving.

Only approved drivers will be permitted to drive on company business, and mandatory checks must be undertaken before any employee is permitted to use a company owned, leased, personal or hire vehicle for company business. This includes, but is not limited to:

* Drivers submitting information to enable the company to carry out a check of Driver Licence Status
* Confirmation of the driver’s insurance status either on the company insurance, or personal insurance with class II Business use cover
* All drivers having read and understood the company fleet manual and other relevant documentation.

All company vehicles will be subject to regular safety checks and inspection, and drivers will be responsible for ensuring that vehicles are kept in a safe and roadworthy condition. Any faults and defects shall be rectified before the vehicle is driven, and minor faults and defects rectified as soon as possible.

All personal vehicles will be subject to employees providing proof of safety inspection checks and valid insurance, and drivers will be responsible for ensuring that vehicles are kept in a safe and roadworthy condition. Any faults and defects shall be rectified before the vehicle is driven, and minor faults and defects rectified as soon as possible.

All drivers must adhere to the company Car Policy at all times along with the rules of the Highway Code.

# HS08 Occupational Health

## 9.1 Occupational Health

The company recognises that so far as reasonably practicable, the health and safety of employees, learners, contractors or visitors should not be adversely affected by our work activities under the [**Management of Health and Safety at Work Regulations 1999**](http://www.legislation.gov.uk/uksi/1999/3242/contents/made).

The company will ensure that where there is a risk to the long-term health of employees, learners or visitors Risk Assessments are undertaken to identify hazards and introduce control programmes and ensure health monitoring.

Managers are responsible for ensuring that risks in their area are identified and that where required, arrangements are made for health surveillance and monitoring. Managers are responsible for:

* Ensuring that adequate Risk Assessments of tasks are undertaken within their area and that significant risks to health are identified.
* Ensure control measures are in place for eliminating or reducing risks to health
* Ensure that findings of Risk Assessments and control measures are communicated to all employees and learners
* Ensure that where required, health monitoring is undertaken for occupational health and ensure that safety procedures are followed.

## 9.2 DSE

The company recognises its obligations under the [**Display Screen Equipment (DSE) Regulations 1992**](http://www.hse.gov.uk/pubns/books/l26.htm) as amended under the [**Health and Safety (Miscellaneous Amendments) Regulations 2002**](http://www.legislation.gov.uk/uksi/2002/2174/made) to take action to prevent, reduce and manage the effects of work related upper limb disorders and other DSE affected conditions for all employees.

To fulfil this obligation, all employees are required to complete a mandatory Self-Assessment DSE Workstation Audit.

Where further assessment is required, a[**full workstation audit**](file:///C:/Users/msg/AppData/Local/Microsoft/Windows/Temporary%20Internet%20Files/Content.Outlook/AppData/Local/Microsoft/Windows/Temporary%20Internet%20Files/Content.Outlook/AppData/Local/Microsoft/Windows/Temporary%20Internet%20Files/Health%20%26%20Safety/DSE/Work%20Station%20Assessment%20documents/DSE%20Workstation%20Assessment.pdf) will be carried out by suitably trained and experienced persons to undertake an assessment of individual circumstances and implement recommendations to reduce the risk of injury.

Records of all DSE Workstation assessments should be maintained by the Facilities Department and will be required to be reviewed in the event of significant changes to the employee’s workstation, location or job description, or in the event of any discomfort being experienced.

Where an employee’s condition or circumstances fall outside of the expertise of trained employees, Assessments will be outsourced to sufficiently trained experts or through Access to Work. Assessments to ensure the correct recommendations are made.

All employees will be provided with information regarding the risks of DSE use, and encouraged to structure their day-to-day work in such a way as to avoid prolonged periods of continuous display screen operations and repetitive tasks. Training will be provided through mandatory Health and Safety learning to ensure that all employees are fully aware of workstation adjustments.

Homeworking

The company Recognises that so far as reasonably practicable, that they have the same Health and Safety responsibilities for people working at home as for any other worker. A Risk Assessment checklist will be completed for permanent homeworkers as well as a DSE Assessment to make sure that all staff are safe and comfortable and their environment is suitable to cater for homeworking.

## Eyecare

All employees at ACT Training receive a health care plan where costs for eye tests and a contribution towards glasses can be claimed via the health care provider. Any questions relating to this plan, should be directed to People and Development.

## 9.3 Expectant Parent

The company recognises that it holds a responsibility to expectant Parents under the [**Management of Health and Safety (HSG65***)*.](http://www.hse.gov.uk/pubns/books/hsg65.htm) Expectant Parents are defined as ‘*someone who is pregnant, has given birth within the previous six months, or is breastfeeding’*.

This includes a requirement to carrying out a risk assessment to assess workplace risks and hazards which could pose a health and safety risk and take appropriate action to reduce the risk.

ACT Training require that all managers are aware of their requirement to request a risk assessment for expectant parents which will be completed by competently trained persons in the form of a Combined DSE & Expectant Parent Risk Assessment.

Information on health and safety risks and the requirement for a risk assessment is provided by People and Development and/or facilities to all known expectant Parents upon notification in the form of a company factsheet.

Managers should be prepared to allow flexible working and make other allowances to ensure the health, safety and wellbeing of expectant parents in the workplace.

# HS09 Employee Wellbeing

## 10.1 Stress at Work

The company is committed to managing work-related stress and supporting employees dealing with stress as part of their work or personal life.

Through Risk Assessments, the company will continue to identify and assess risks to mental and physical health and safety so far as reasonably practicable, whilst aiming to create a working environment in which all employees have the confidence and ability to seek help and advice and discuss any work-related problems they may have.

By managing employee work-related stress, the company aims to minimise harmful stress levels by:

* Identifying specific stress hazards in the workplace
* Recognise, and provide training to help managers recognise symptoms of unhealthy stress
* Take appropriate preventative stress avoidance and monitor performance
* Act promptly to provide support once stress is identified
* Create an open dialogue which supports employees to seek help and advice from managers as required.

All managers are responsible for developing, implementing and monitoring management strategies under their areas to reduce and control levels of occupational stress.

Managers should undertake sufficient training to enable them to adopt a style of management to be conducive to the achievement of company objectives without putting unnecessary, excessive or undue pressure on employees.

Anyone experiencing harmful work-related stress levels should refer to their immediate line manager directly.

Employees will have responsibility for themselves and take appropriate action to manage their own stress levels and identify pressure points from the home and/or working life.

All cases must be treated with sensitivity and confidentiality.

ACT Training have access to confidential counselling service for employees via the health care plan as well as our own in-house counselling team. Employees can get details of the health care plan counselling service from their welcome pack. ACT Trainings internal counselling service details can be found via People and Development or our Health and Wellbeing team.

## 10.2 Addiction

The company recognises the hazards created to employees and learners resulting from all addictions including but limited to alcohol, substance abuse and/or Gambling addictions and the ill effect this can have on the health, safety and wellbeing of employees, learners and others.

The company will endeavour to ensure that an employee, learner or contractors use of alcohol, prescription drugs or ‘abuse’ drugs does not adversely affect the health and safety of the companies operations.

Basic company rules relating to the above are detailed in the Drug and Alcohol Policy saved on SharePoint.

If an employee, learner or contractor is suspected, with justification, to be under the influence of drugs or alcohol, or undertaking activities which affect their work or the health and safety of others, the company reserve the right to suspend work until investigations can be undertaken.

In order to develop a positive safety culture, the company will endeavour to help raise awareness and comply with legislation, in particular the Misuse of Drugs Act 1971, and the [**Corporate manslaughter and Corporate Homicide Act 2007**](https://www.legislation.gov.uk/ukpga/2007/19/contents)and related [**Management of Driving for Work**](http://www.hse.gov.uk/pubns/indg382.pdf)under the [**Management of Health and Safety (HSG65**](http://www.hse.gov.uk/pubns/books/hsg65.htm)**).**

Under extreme circumstances, the company may require employees or contractors to undergo screening to ensure the health and safety of others where there is a justifiable need. This should be undertaken with sensitivity and confidentiality involving People & Development.

Any worker found to have tested positive for drugs or alcohol will be immediately suspended from the work in which they are engaged pending investigation.

By managing employees and in developing a positive safety culture, the company will aim to ensure that:

* Control measures are in place to prevent, so far as reasonably practicable, anyone from attending work, or undertaking work as a contractor where they are under the influence of alcohol or drugs.
* Recognise, and provide training to help managers recognise symptoms of addiction
* Act promptly when issues are identified following company disciplinary or HR procedure, particularly where an employee’s role poses significant risk to others (i.e. company drivers).
* Create an open dialogue which supports employees to seek help and advice from managers prior to any disciplinary action as required in support of alcohol, drug, gambling or other addictions.
* Where required, take suitable action through disciplinary procedures where an employee may have breached the company’s Health and Safety Policy and put others at risk.

ACT Training have access to confidential counselling service for employees via the health care plan as well as our own in-house counselling team. Employees can get details of the health care plan counselling service from their welcome pack. ACT Trainings internal counselling service details can be found via People and Development or our Health and Wellbeing team.

## 10.3 Domestic Abuse and Stalking

The company recognises a duty of care to support and assist any affected employee in such matters relating to domestic abuse, sexual violence, stalking and considers any breach in the work place to be a form of harassment.

It is also recognised that in situations where an employee experiences an incident of domestic abuse, sexual violence, dating violence and stalking of any kind outside of the workplace there is an impact on the business and implications that need to be considered.

Situations where an employee is identified as committing such acts will be investigated as a breach of the Code of Conduct and as such may be found to be an act, or acts, of gross misconduct. Where employees present themselves as perpetrators of such acts the business may offer support to them overcoming the problem.

In order to develop a positive safety culture, the company will endeavour to help raise awareness and comply with legislation, in particular the[**Serious Crime Act 2015**](http://www.legislation.gov.uk/ukpga/2015/9/part/5/crossheading/domestic-abuse/enacted).

By managing employees and in developing a positive safety culture, the company:

* recognises and accepts an employee’s right to privacy and a need for confidentiality if they are experiencing incidents of the nature described above
* can offer a safety plan to ensure that the employee is safe getting to and from the office, and whilst at work.
* encourages all employees to report to their Line Manager or People and Development in confidence if they suspect a co-worker is experiencing or perpetrating domestic abuse or stalking.
* recognises that any victim of violence may struggle to fulfil the requirements of their role.
* accepts that victims may require time off due to requiring medical or legal assistance, counselling, attend court or, in more severe cases, be relocated for a period of time. ACT Training will assess the circumstance on a case-by-case basis
* will not discriminate in any way against an employee that identifies themselves as a victim or who submits a complaint against another employee for committing such acts. This is unless the accusation is either proven to be false or a reasonable belief established to cast doubt on the matter.

If you are experiencing domestic abuse, stalking, or know of somebody in the workplace who is and would like information, refer to the following resources:

* National Domestic Abuse helpline – [**www.nationaldomesticviolencehelpline.org.uk**](http://www.nationaldomesticviolencehelpline.org.uk)
* Men’s Advice Line - [**www.mensadviceline.org.uk**](http://www.mensadviceline.org.uk)
* National Stalking Helpline - [**www.stalkinghelpline.org**](http://www.stalkinghelpline.org)
* Paladin – National Stalking Advocacy Service - [**www.paladinservice.co.uk**](http://www.paladinservice.co.uk)
* Respect - [**www.respectphoneline.org.uk**](http://www.respectphoneline.org.uk)

ACT Training have access to confidential counselling service to employees via the health care plan as well as our own in-house counselling team. Employees can get details of the health care plan counselling service from their welcome pack. ACT Trainings internal counselling service details can be found via People and Development or our Health and Wellbeing team.

## 10.4 Workplace Violence

The company recognises its responsibilities under the Health & Safety at Work Act. This Act places a legal duty on employers to ensure, so far as reasonably practicable, the health, safety, and welfare of workers. This includes protecting them from work-related violence.

ACT Training Ltd does not tolerate any type of workplace violence committed by or against employees. Employees are prohibited from making threats or engaging in violent activities. This list of behaviours provides examples of conduct that is prohibited:

* Causing physical injury to another person.
* Making threatening remarks.
* Displaying aggressive or hostile behaviour that creates a reasonable fear of injury to another person or subjects another individual to emotional distress.
* Intentionally damaging employer property or property of another employee.
* Possessing a weapon while on company property or while on company business.
* Committing acts motivated by, or related to, sexual harassment or domestic violence.

**Reporting Procedures**

Any potentially dangerous situations must be immediately reported to a manager or the P&D department. Reports can be made anonymously, and all reported incidents will be investigated. Reports or incidents warranting confidentiality will be handled appropriately, and information will be disclosed to others only on a need-to-know basis. All parties involved in a situation will be counseled, and the results of investigations will be discussed with them. ACT Training will actively intervene at any indication of a possibly hostile or violent situation.

**Risk Reduction Measures**

***Hiring***

The P&D department takes reasonable measures to conduct background investigations to review candidates’ backgrounds and to reduce the risk of hiring individuals with a history of violent behaviour.

***Safety***

ACT Training conducts annual inspections of the premises to evaluate and determine any vulnerabilities to workplace violence or hazards. Any necessary corrective action will be taken to reduce all risks.

***Individual situations***

Although ACT Training does not expect employees to be skilled at identifying potentially dangerous persons, employees are expected to exercise good judgment and to inform the P&D department if any employee exhibits behaviour that could be a sign of a potentially dangerous situation. Such behaviour includes:

* Discussing weapons or bringing them to the workplace.
* Displaying overt signs of extreme stress, resentment, hostility or anger.
* Making threatening remarks.
* Showing sudden or significant deterioration of performance.
* Displaying irrational or inappropriate behaviour.

**Employees at risk**

The P&D department will identify and maintain a list of employees who have been determined to be at risk for becoming victims of violence because of the nature of their job or because they are subject to harassment, violence or threats from a nonemployee. P&D and Facilities will design a plan with at-risk employees to prepare for any possible emergency situations.

**Dangerous/Emergency Situations**

Employees who confront or encounter an armed or dangerous person should not attempt to challenge or disarm the individual unless trained to do so. Employees should remain calm, make constant eye contact and talk to the individual. If a manager can be safely notified of the need for assistance without endangering the safety of the employee or others, such notice should be given. Otherwise, employees should cooperate and follow the instructions given.

**Enforcement**

Threats, threatening conduct, or any other acts of aggression or violence in the workplace will not be tolerated. Any employee determined to have committed such acts will be subject to disciplinary action, up to and including termination. Nonemployees engaged in violent acts on the employer’s premises will be reported to the proper authorities and fully prosecuted.

**Learner / Pupil Violence**

ACT Training Ltd Recognises that they have also got a duty of care for their Learners/pupils within their centres and schools.

This is covered by separate policy’s please see below links:

[ACT Behavioural Policy’s](https://acttraining.sharepoint.com/:w:/r/sites/BreakawayTeam/_layouts/15/Doc.aspx?sourcedoc=%7B4E8A25C6-D5C5-4746-95F1-AA422FAADA4C%7D&file=ACT%20JGW%2B%20Behaviour%20Policy%20New.docx&action=default&mobileredirect=true)

[ACT Schools Behavioural Policy’s](https://acttraining.sharepoint.com/:w:/r/sites/BreakawayTeam/_layouts/15/Doc.aspx?sourcedoc=%7B5C2633C8-2C18-4F33-9BA7-5FAF6FE56B48%7D&file=ACT%20Schools%20Behaviour%20Policy%20New.docx&action=default&mobileredirect=true)

[ACT Safe Touch and Physical Intervention Policy’s](https://acttraining.sharepoint.com/:w:/r/sites/BreakawayTeam/_layouts/15/Doc.aspx?sourcedoc=%7B27332714-3B8E-42F8-BD98-EE035C3E023F%7D&file=ACT%20JGW%2B%20Safe%20Touch%20and%20Physical%20Intervention%20Policy%20New.docx&action=default&mobileredirect=true)

[ACT Schools Safe Touch and Physical Intervention Policy’s](https://acttraining.sharepoint.com/:w:/r/sites/BreakawayTeam/_layouts/15/Doc.aspx?sourcedoc=%7B3AB7DE63-20DF-4B21-AE32-5DF569F6CDDA%7D&file=ACT%20Schools%20Safe%20Touch%20and%20Physical%20Intervention%20Policy%20New.docx&action=default&mobileredirect=true)

# HS10 Employee Consultation

## 11.1 Consultation of Employees on Health and Safety Matters

**ACT** ltd Recognises the importance of consultation with their employees in line with its requirements as defined by the [**Health & Safety (Consultation with Employees) Regulations 1996.**](https://www.hse.gov.uk/pubns/priced/l146.pdf)

The Management of **ACT** recognise communication and consultation as an essential part of their overall health and safety management and will therefore:

* Consult with employees and all other interested parties at all levels.
* Consultation with staff will be facilitated through the means of Staff meetings held on a quarterly basis or as often as is deemed necessary.

The purpose of the meetings is to provide a forum for the exchange of information and concerns or ideas. This will also allow the management team to establish the effectiveness of current policies and procedures.

# HS11 Security and Visitor Management

## 12.1 Security

ACT Training is responsible for providing a safe and secure environment for employees, learners, contractors and visitors to all ACT Centres.

## 12.2 Visitor Management

The company recognises its responsibility towards protecting the health and safety of persons visiting the company’s premises.

The responsibility for visitors will remain with the responsible manager/company representative. Employees must ensure that:

* Where possible, Employees will provide as much notice to reception when expecting visitors particularly where work or other activities are taking place.
* All visitors are required to sign into the office ‘visitors IPad, QR Code or book’ detailing their name, company, host contact and if applicable, vehicle registration.
* All visitors must be accompanied at all times, within reason, and ensure that they are identified as visitors to site at all times.
* The responsible person for the visitor must ensure that in the event of an emergency evacuation the visitor is escorted safely from the building and that all visitors under their control are accounted for upon roll call.
* The Company’s representative must ensure that visitors obey the company’s Health and Safety rules at all times.
* On leaving site, the Company’s representative must escort visitors from the building, to reception where applicable and ensure any visitors badges are handed back in.

## 12.3 Lone Working and Remote Home Working

The company recognises the need for employees to work flexibly. Lone working of employees can pose potential risks and the company aims to limit, so far as reasonably practicable, risks associated with lone and remote working from others.

The company will ensure it complies with [**HSE guidance**](http://www.hse.gov.uk/pubns/indg73.pdf)on lone workers who are defined as ‘*those who work by themselves, without close or direct supervision’* and can include, but may not be limited to:

* Employees, consultants or contractors working alone or remotely from others.
* Employees working remotely from home
* Employees working outside of normal office hours (i.e. shift workers or other contractors)
* Employees working out of the office/centre (i.e. on the road between centres or spending significant time visiting learners in their workplaces).

The responsibility for ensuring lone worker safety cannot be transferred to another person, including employees lone working, and it is the manager’s responsibility to assess lone worker risks and take steps to avoid or control risks where necessary.

Managers will be responsible to ensure that:

* All employees who undertake lone working are aware of the procedures for lone working in effect
* Risk Assessments are carried out for workers or activities
* Ensure that the contents of Risk Assessments are communicated to all affected employees
* Ensure that control measures to reduce risks are in place, and are being used effectively
* Ensure that adequate reviews of Risk Assessments and control measures take place and that scheduled visits and consultation with employees takes place

Employees affected by lone working must ensure that:

* They have understood the information communicated to them in regards to Risk Assessments and the control measures being put in place
* They comply with control measures and work with managers to review and reduce risks.

## Control Measures

Managers need to ensure that there are safe systems of work to ensure that lone workers can work safely, and that there are procedures in place to deal with emergencies. This may include ensuring that company mobile telephones are available, or that there are procedures for ensuring employees ‘check in’ at regular intervals.

Safety training and reviews for lone workers (such as evacuation drills and health surveillance) should take place for lone workers as for other employees.

There may be circumstances where managers will need to make special consultation with employees to ensure that there are no medical or other conditions (such as pregnancy) which may make lone working unsuitable.

The [**Hollie Guard App**](http://hollieguard.com/) helps to protect people from possible danger when working alone. Hollie Guard turns smartphones into an advanced personal safety device at the touch of a button. The app is accessible for those on Windows, Android and iOS.

## Review

Managers should review Vulnerable Person Risk Assessments and control measures regularly and identify additional actions if these are known to not be followed (such as remove an employee’s authorisation to work alone).

# HS12 Welfare, Waste and WEEE

## 13.1 Welfare Facilities

The company shall provide at all site locations facilities required to meet the requirements of the ***[Workplace (Health, Safety and Welfare) Regulations 1992 Approved Code of Practice](https://www.hse.gov.uk/pubns/priced/l24.pdf)*[.](https://www.hse.gov.uk/pubns/priced/l24.pdf)**

This includes, but is not limited to, insuring suitable and appropriate provision of:

* ***Ventilation***

Ensure that workplaces are adequately ventilated with fresh, clean air drawn from an external uncontaminated source.

* ***Temperature for indoor workplaces***

Ensure that workplaces maintain minimum temperatures for workplaces whilst understanding that individual preference and environmental factors (such as humidity and sources of heat in the workplace) may make it difficult specify a thermal environment that satisfies everyone. Recommended minimum temperature for sedentary (office) environments should normally be at least 16 °C.

* ***Lighting***

Ensure sufficient lighting for people to be able to work and move about safely. Lighting and light fittings should not create hazards and adequate automatic emergency lighting should be maintained, powered by an independent source, should there be a sudden loss of power.

* ***Cleanliness and Waste Disposal***

Work environments should be kept clean and undergo regular maintenance. Waste should be stored in suitable receptacles and removed regularly to avoid build up.

* ***Space, Workstations and Seating***

Office space should have enough space to allow people to move freely with ease whilst maintaining a minimum standard of 11 cubic meters of space per person. Workstations should be fit for purpose and ensure sufficient room for employees to leave swiftly in the event of an emergency. Office task seating should be adequate to support the lower back provide ergonomic adjustment.

* ***Sanitary Conveniences and Washing Facilities***

Suitable sanitary conveniences and washing facilities will be maintained clean and adequately ventilated and lit. Cleaning facilities will provide hot and cold or warm water, soap and means of drying.

* ***Drinking Water***

An adequate supply of fresh drinking water will be provided at all locations preferably from a direct mains supply. Bottled water/other dispensing systems will be provided during works which may affect any mains fed water supply. Any non-drinking water supplies will be adequately marked.

* ***Accommodation for clothing or changing***

Where changing facilities are provided, secure space should be provided for employees to store clothing and personal belongings.

* ***Eating/Rest Facilities***

Rest areas for employees should be provided in each location for use during breaks away from their normal area of work. Eating or rest facilities should be cleaned regularly and maintained in good condition. Suitable rest facilities should be available for use for expectant mothers.

* ***Personal Protective Equipment (PPE)***

Where required the company shall ensure employees are provided with appropriate PPE to reduce risk of injury as required in Risk Assessments. PPE must be provided at no cost to the employee.

# **13.2 Waste Management**

The company recognises its obligation under [**The Waste Regulations 2011**](https://www.legislation.gov.uk/ukdsi/2011/9780111506462) and the danger to health and the environment from waste generated by the company processes.

Waste is defined as ‘any object, material or substance that the company owns or produces and wishes to dispose of or have recovered’ and the company takes appropriate action to manage the following:

* Apply the waste hierarchy when transferring waste
* Segregate recyclables from general waste
* To meet and exceed our duty of care in the production, storage, transport and disposal of controlled waste whilst minimising harming to the environment.
* To ensure waste is only transferred to an authorised third-party
* To complete/request waste transfer notes and waste consignment notes to be signed and maintained for a minimum of 2 and 3 years respectively.

The company recognises its obligation under the Hazardous Waste Regulations 2005 and Hazardous Waste (England and Wales) (Amendment) Regulations 2016 and the additional dangers to health and the environment from hazardous waste generated by the company processes.

The company will ensure that hazardous waste disposal will be carried out in line with the regulation and that disposal contractors will provide signed consignment notes to be maintained for a minimum of 3 years.

The company will ensure that hazardous waste disposal will be carried out in line with the regulation and that disposal contractors will provide signed consignment notes to be maintained for a minimum of 3 years.

See environmental procedures EP06, EP09 and EP10 for further information.

## 13.3 Waste Electric and Electrical Equipment (WEEE)

The company recognises its obligation under the Waste Electronic and Electric Equipment Regulations 2013 and the danger to health and the environment from waste generated by the company processes and to improve environmental performance of business that use and produce electronic waste.

Both IT and non-IT WEEE are managed by Facilities Team. See environmental procedures EP06, EP09 and EP10 for further information.

HS13 EXTERNAL EVENTS / ACTIVITIES

14.1 ON SITE ORGANISED EVENTS / ACTIVITIES

The Company recognises its responsibility towards protecting the health and safety of Learners, Staff and visitors when Hosting/Organising events and activities.

When hosting Organised Events/Activities on one of our sites which isn’t classed as Business as usual a written Risk Assessment would need to be completed and sign off is needed from the Facilities team or Enrichment Manager before the Event/Activity can take place.

14.2 OFF SITE ORGANISED EVENTS/ACTIVITIES

The Company is committed to ensure that all individuals’ have the opportunity to participate in off-site activities that are controlled and managed safely. Risk Assessments will need to be completed prior to each activity. Risk Assessments from the external provider (Where appropriate) and a copy of their Public Liability Insurance will also need to be viewed prior to an event taking place.

The Enrichment Manager and Facilities must be notified for all external events involving Learners. All Staff based external events must be notified to the P&D and Facilities Team.

Please follow the Off-site Activities Policy’s and the Staff Team Building Policy when planning an off-Site Event/Activity which can be found on the Iris System:

How visits may be planned and approved

Each site within ACT has a Centre Manager who is involved in the planning and management of off-site visits.

The Centre Manager should be specifically competent, ideally with practical experience in leading and managing a range of visits similar to those typically run by the establishment. Commonly, but not exclusively, such competence will be identified in a person on the senior management of the establishment.

The Centre Manager should attend initial training as soon as possible after appointment. Subsequent update training or a repeat full course is particularly recommended for those who are involved in the role infrequently.

The Centre Manager will:

* Be competent to lead and help with trips (being competent means that the Leader has demonstrated the ability to operate to recognised standards of good practice, and has sufficient relevant experience and knowledge of the group, the activity and the venue);
* Check that Visit Leaders are competent and ensure all details of necessary training and qualifications are logged on the CascadeGo HR sytem;
* Ensure that Risk Assessments are completed.
* Check visit plans and sign-off Risk Assessments with support from the Health and Safety Manager;
* Obtain Risk Assessments and public Liability Insurance from the Off-Site company for the Activity/Event.
* Complete the activity checklist.
* Liaise with the Purchasing Department to verify that all private car drivers/minibus companies, have had satisfactory DBS checks;
* Ensure that regular volunteers and those assisting with overnight/residential stays have had satisfactory DBS checks carried out.
* Make sure that all necessary consent and medical forms are obtained;

# 14.1 Appendix

## Health and Safety Policy Statement

It is our policy that ACT Limited (and subsidiary companies) should be a safe place to work or visit. We will do all that is reasonably practicable to prevent any unplanned event potentially causing personal injury or damage to property and provide protection from foreseeable workplace hazards. We will comply with the Health and Safety at Work ACT 1974 and all subsequent relevant regulations, approved codes of practice and orders to fulfil our obligations to ensure the Health, Safety and Welfare of our employees, learners, visitors and contractors whilst they are on our premises and members of the public affected by our operations.

In order to meet our duties under the Health and Safety at Work Act, ACT Limited training will so far as is reasonably practicable:

* Provide adequate control of health, safety and environmental risks arising from our work activities
* Provide and maintain a safe and healthy working environment
* Consult with its employees on all matters of health and safety
* Provide safe systems of work
* Provide equipment and machinery that is safe and maintained in a safe condition with appropriate safe systems of work
* Ensure Information, instruction, training and supervision is provided for employees and learners and that they are competent to carry out the task.
* Prevent accidents and cases of work-related ill health for employees, learners, visitors and contractors
* Ensure safe handling and use of articles and hazardous substances
* Review and revise our Health and Safety as circumstances change, but at least annually; we will take reasonable measure to improve on these objectives

## Commitment to Learner Health, Safety and Welfare

ACT Limited sees the health safety and welfare of learners as a fundamental part of the company’s core values. ACT Limited feels that all learners should expect learning to take place in a safe, healthy and supportive environment. ACT Limited expects all sub-contractors and anyone delivering learning on its behalf to implement this core value by ensuring that they meet all statutory obligations and have suitable and sufficient arrangements in place for learner health, safety and welfare. ACT Limited will seek assurance via way of regular audits that its sub-contractors and employer placements have suitable and sufficient arrangements for learner safety and where standards are not met ACT Limited will take appropriate action to ensure that standards required by this policy are met.

Any accidents or incidents involving learners should be notified to the Facilities/Compliance Manager immediately to ensure that a full investigation takes place.

Our employees also have obligations with regard to Health and Safety. They must follow the procedures set out in our Health and Safety Policy Guidance Document. Employees must also:

* Co-operate with the management of ACT Limited on all health and safety matters
* Take reasonable care and follow any safe systems of work implemented to protect their health and safety
* Report accidents, incidents and unplanned events that have led or may lead to personal injury or property damage
* Assist in the investigation of any such unplanned event

# 14.2 Relevant Legislation/Documentation

Listed below are relevant legislation and Approved Code of Practice Documents referred to in the above technical

* *Approved Code of Practice (L8) - Legionnaires Disease: The Control of Legionella Bacteria in Water Systems.*
* *BS 7121 Lifting Operations.*
* *CDM (Construction, Design and Management) Regulations 2015.*
* *Construction [Head Protection] Regulations 1989.*
* *Control of Asbestos Regulations 2012.*
* *Control of Noise at Work Regulations 2005.*
* *Control of Pollution (Amendment) Act 1989.*
* *Control of Substances Hazardous to Health (COSHH) Regulations (As amended).*
* *Controlled Waste (Registration of Carriers and Seizure of Vehicles) Regulations 1991.*
* *Deposit of Poisonous Waste Act 1972.*
* *Electricity at Work Regulations 1989.*
* *Environmental Protection Act 1990.*
* *Hazardous Waste (England and Wales) (Amendment) Regulations 2016*
* *Health and Safety [Display Screen Equipment] Regulations 1992.*
* *Health and Safety [First Aid] Regulations 1981.*
* *Health and Safety at Work etc Act 1974 (HASAWA).*
* *High Inflammable and Liquefied Petroleum Gas Regulations 1982.*
* *Lifting Operation and Lifting Equipment Regulations 1998.*
* *Management of Health and Safety at Work Regulations 1999.*
* *Manual Handling Operations Regulations 1992.*
* *Personal Protective Equipment at Work [PPE] Regulations 1992.*
* *Petroleum Spirit [Plastic Container] Regulations 1982.*
* *Provision and Use of Work Equipment Regulations 1998.*
* *Regulatory Reform (Fire Safety) Order (RRFSO) 2005.*
* *Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR).*
* *Safety, Health and Welfare at Work Act 2005*
* *Safety Representatives and Safety Committees Regulations 1977*
* *Safety Signs and Signals Regulations 1996.*
* *Serious Crime Act 2015*
* *The Health and Safety (Consultation with Employees) Regulations 1996.*
* *Waste Electrical and Electronic Equipment Regulations 2013*
* *Workplace (Health, Safety and Welfare) Regulations 1992.*

Listed below are relevant internal documents which can be made available upon request:

* Environmental Management Manual
* Environmental Policy
* EP02 Emergency Preparedness Process
* EP03 Environmental Impacts and Aspects Process
* EP04 Legal Compliance Review Process
* EP05 Monitoring and Measuring Process
* EP06 Waste Management Process
* EP07 Pollution Response Process
* EP08 Evaluation of Compliance Process
* EP09 Waste Management Procedure
* EP10 Hazardous Waste Management Procedure
* EP13 Training Process
* Crisis Management Procedures