



CENTRAL TRAINING GROUP

Health and Safety Policy 2018-2019

MISSION STATEMENT

Central Training is an innovative and high quality Learning Provider, committed to the continued improvement of learners' and employees' skills.

We aim to:

- Provide learners with the best possible level of teaching, learning, assessment and information, advice and guidance to enable them to achieve their goals and exceed their expectations
- Continually review the service that we provide to our employers and make improvements to help them develop their staff and businesses
- Encourage creativity and innovation from staff and provide training, information, advice and guidance to assist them in their personal development to ensure that they fulfil their potential
- Promote lifelong learning with learners, staff and employers

OUR VISION

We aim to be recognised as one of the leading Learning Providers in the UK for youth and adult programmes by striving to be Outstanding at our next inspection and by continually improving our Teaching and Learning and Learning Support to continually improve our success rates and learner and employer achievements.

'BREAK THE BARRIERS – LIVE THE DREAM'

OUR VALUES

- We are proud of what we do and continue to strive to be the best
- We actively encourage creativity through individuality and diversity
- We strive to make a positive difference by valuing each other and showing mutual respect
- We pride ourselves in our staff development and training and actively promote from within
- We ensure that the health, safety and well-being of our learners and staff is at the heart of the company
- We actively promote and encourage our staff and learners to contribute to community initiatives and charitable events

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Directors' Foreword

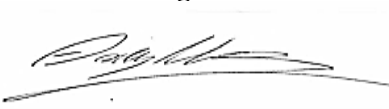
The Health and Safety at Work Act (1974) and the Management of Health and safety at Work regulations (1999) both place a legal obligation on everyone within Central Training Group¹ and its partners (CTG) to take individual responsibility for safeguarding and health and safety generally.

This Safeguarding/Health and Safety policy will help you to do this through improved awareness of safety matters, leading to better, safer working practices. The regulations also place a duty on employers to manage safeguarding and safety effectively. Our standards are good and have been rising as the company has developed, but as always, we seek to improve them further. This policy is part of that continuing effort.

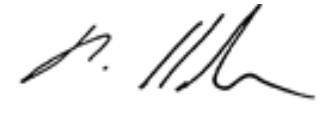
No policy can outline every possible safeguarding issue or hazard or give an instant solution to every problem. What it can do is advise about possible sources of danger and illustrate procedures to minimise them, and point to sources of information.

This policy is intended to promote safe systems of work so that you can do your job or study with the least risk of harm to yourself or anyone else. Take the time to read it thoroughly and raise any points that you do not understand or that cause you concern with your centre manager.

Andrew Wright



Martin Kolton



Directors: Central Training Group

¹ In this document, 'Central Training Group' shall mean any company forming part of the Central Training Group of companies.

Introduction

This Health and Safety Policy reflects CTG's continuing experience in managing safety and takes into account current legislation on safeguarding and safety generally and also observations made by partners, safety auditors and customers. CTG regularly check Health and Safety updates and legislation to ensure that our information is current.

The Safeguarding of staff and learners at Central Training Group is deemed to be the responsibility of all members of CTG and Safeguarding along with the associated elements of Child Protection are integral to all activities associated with CTG whether on or off site.

This Policy for Health and Safety, included under the 'umbrella' of Safeguarding and for which CTG has a responsibility in supporting learners includes:

- Basic Compliance
- Safe Learner Concept
- Workplace Safety
- Housekeeping
- Manual Handling
- Work Equipment
- Electrical Equipment
- Company Cars
- Hazardous Substances
- Noise
- VDUs
- PPE
- Dealing with Accidents
- Risk Assessments

To support staff and learners to keep themselves:

- Healthy (including drugs/alcohol – see Drug and Alcohol Abuse Policy)
- Safe

To ensure that staff and learners

- Feel safe whilst undertaking CTG activities
- Know how to report instances related to Health and Safety

To educate learners to understand and make informed decisions regarding:

- Their own safety
- Using equipment
- Following procedures in situation of Fire/Emergency

Under Health and Safety:

- Emphasise the management of safety and changes to liability;
- Incorporate background and advice on risk assessment;
- Incorporate the 'Safe Learner' blueprint promoted by the SFA;
- Will assist in the standardisation of safety practice throughout the Group.

Staff responsible for Safeguarding and Health and Safety

- Martin Kolton (Company Chairman) – overall responsibility
- Sue Irons (Operational Director of Recruitment and Safeguarding/Designated Child Protection Officer/Safeguarding Champion)
- Elaine Moreline (Director of Quality – Designated Child Protection Officer)
- Louise Bell (Child Protection Officer)

Staff Responsibilities

- All staff undertake training in:
 - Child Protection
 - Prevent
 - Health and Safety
 - Equality and Diversity
- To ensure they are familiar with CTG policies and procedures related to Safeguarding including:
 - Health and Safety
 - Equality and Diversity
 - Additional Learning Support
 - Disciplinary Procedures
 - Prevent
 - Internet Safety
 - Staff Code of Conduct
 - Student Confidentiality
 - Recruitment and Selection Procedures, where appropriate.
 - Lone working
 - Individual meetings with learners
 - Child Protection

[A copy of this policy must be placed on public display in each centre.](#)

Keep the folder in a safe place so that updates can be added when required. By law, a company's Health and Safety Policy should be reviewed regularly. We shall be doing this. Please contact the Director for Further Education and Recruitment if you have any suggestions or spot any omissions.²

² **Note Words in bold type refer to legal requirements.**

'Must' and **'should'** Although this manual attempts to speak in plain English, a certain amount of legal wordage is inevitable.

Where the word **'must'** appears in **bold type**, it indicates an absolute duty under health and safety law, where failure to comply is automatically an offence. In health and safety law such requirements are always phrased as 'must' or 'shall'. This manual only uses 'must'.

Where the word **'should'** appears in **bold type** it indicates that a slightly lesser degree of compliance is required, say with Approved Codes of Practice or Guidance Notes.

Failure to comply with these instructions, though not in itself an offence, severely weakens any defence a company might put forward in the event of a case being brought against it regarding health and safety management.

Where these words occur in plain type, they usually refer to contractual obligations or company requirements.

YOUR DUTY TO TAKE CARE

The Health and Safety at Work Act 1974, places great responsibilities on employers and employees alike. One of the main responsibilities is the duty of every employee to take care. 'Employee' in this case means 'every individual' at work in a company, from senior managers, through to learners. This individual³ responsibility is **enforceable** under health and safety law and under **civil** law too.

As far as employees are concerned, the Health and Safety at Work Act says you have a duty to take reasonable care for your **own** health and safety and of **those** who may be affected by your **actions** at work.

You **must** co-operate with CTG in carrying out its responsibilities, as an employee, towards safety. This may mean wearing proper protective clothing or attending appropriate safety training as required.

The Act also says that you **must not** interfere with, or misuse, anything provided in the interest of health, safety or welfare. A simple example of this would be misusing fire extinguishers or the first aid boxes.

You **should not** use work equipment or materials in a manner that could create danger for yourself or other people.

You **must** be constantly vigilant for safety hazards and must report anything you consider to be dangerous immediately to your Supervisor, Centre manager or Sue Irons or Jessica Jones.⁴

POLICY SECTION

Policy Statement – Statement of Intent

It is the policy of Central Training Group to comply with our statutory responsibilities under the Health and Safety at Work Act 1974⁵, the Management of Health and Safety at Work Regulations 1999 and the applicable regulations. We shall also conform to other guidance⁶ concerning good health, safety and welfare practice.

So far as is **reasonably practicable**, CTG will:

- Ensure safe and healthy working conditions for our employees, learners, customers, visitors and volunteers;
- Ensure the safety of our equipment, systems of work and premises;
- Ensure that anyone who may be affected by our operations is not exposed to any risks to their health and safety.

Mission Statement Concerning Safety Management

It is our policy to manage safety in an effective way; to set up robust systems of safety management and to appoint competent persons to assist in the planning, carrying out and review of safety policy.

³ See *Enforcement and Liability* on page 20

⁴ Under recent changes to the **management of Health and Safety at Work Regulations 1999** failure to report hazards can result in **individual** employees being subject to legal action. See *Enforcement and Liability*; note on page 22

⁵ Specifically, Section 2(3)

⁶ Approved Codes of Practice and Guidance Notes

The aim of health and safety management within CTG is:

- To reduce the risk of harm to members of staff, learners, contractors or members of the general public arising from the normal business activities of the group.
- To reduce the risk of loss arising from:
 - Damage to premises, equipment and materials, for example by fire;
 - Business interruption, perhaps caused by accidents and emergencies;
 - Legal Action – e.g. claims against the company for compensation;
 - Loss of Business; for example, a withdrawal of contract due to health and safety breaches.
- To manage health and safety in a comprehensive and constructive way.
- To develop and promote a safety culture within the group.
- To ensure child protection and safeguarding of every learner.

MANAGEMENT OF SAFETY

Health and Safety Communication and Consultation

Our health and safety policy will be communicated to all new staff and learners on their first day at CTG during their induction.

This policy will be made available all staff and learners alike, either in printed format or via the company 'Z' Drive. Further information and guidance, as well as updates and reviews of this policy, will be circulated annually.

Health and safety issues are on the agenda of executive management group meetings and staff meetings. Changes to health and safety policy and practice are offered for discussion throughout the group.

In addition, individual employees and learners can raise urgent concerns or **report** hazards:

- To their tutor or Centre Manager.
- As tabled AOB items at formal staff / board meetings
- Directly with the responsible Director via e-mail.

Health and Safety meetings will take place as required to assist the board of directors in drawing up, communicating and managing the safety policy.

Arrangements for the Management of Safety

The present Directors of CTG are **Martin Kolton, Andrew Wright, Elaine Moreline, Prim Campbell and Sue Irons**. Overall responsibility for Health and Safety lies with them. **Martin Kolton** is the director with specific responsibility for board level oversight of health and safety policy and direction.⁷

Sue Irons is the nominated competent person in health and safety to carry out risk assessments, prepare reports and other documents as required, attend meetings with auditors and inspectors and provide professional services for research, investigation and advice.

⁷ *Conforming to the Management of Health and Safety Regulations 1999*

Responsibility for day-to-day health and safety practices in CTG rests with:

- The responsible Director, Martin Kolton
- Centre Managers and competent persons (safety of CTG workplaces)
- Designated Child Protection Officers in London and Southend
- Employees, volunteers and learners (responsibility for their **own** safety, the safety of **others** and the duty to **report** hazards)

Employees, volunteers and learners **must** carry out safety policies and procedures laid down by the Directors. Centre and Training Managers have a responsibility for health and safety within their premises and shall ensure that employees, learners and volunteers comply with health and safety policy.

Hazard Reporting

A safety hazard which cannot be put right immediately, without exposing individual employees or learners to danger, **must** be reported to the Centre Manager or Sue Irons. If a member of staff or learner reports a safety hazard, CTG will take steps to investigate it and take control measures as necessary. The individual will then be advised of these measures.

Risk Assessments

As a minimum, annual Risk Assessments will be carried out to identify health, safety and welfare hazards to workgroups and individuals and, so far as is **reasonably practicable**, introduces control measures to eliminate or reduce them.⁸

Accidents

CTG will ensure that robust procedures exist to investigate, record and report, accidents, near misses and dangerous occurrences on our premises.

Sue Irons will investigate any accidents that occur within Central Training Group sites or to Central Training Group learners off site. Sue will liaise with Martin Kolton, the responsible Director on reporting under RIDDOR, if applicable.⁹

Inspections and Audits

Centre Managers are responsible for conducting monthly general safety inspections of their sites. This should include **visual** safety checks on work equipment. Any risks or potential risks should be reported to Sue and/or Martin immediately.

Centres are required to facilitate visits by safety auditors from the ESFA or other contract partners and to provide such documentation as they may require.

Recruitment Officers must ensure that pre-placement safety checks are completed for all new CTG employers and monitor workplace safety via teaching and assessment visits thereafter, which must document safety compliance at the employer's premises, and ongoing safety arrangements affecting the learner. 'Regular monitoring' shall mean 'as laid down in contractual obligations' to the ESFA or other contract partners.

The Centre Managers of any CTG workplace are required to comply with any requests or notices from the Enforcing Authorities and immediately inform the directors responsible for safety, Martin Kolton/Sue Irons.

⁸ **Risk Assessments** carried out by the independent consultant are **generic**. Focussing on the risks posed to groups of workers employed by Central Training Group.

Certain risk assessments **must** be carried out individually and the risk assessments carried out by the consultant will not satisfy this requirement e.g. for: **Young employees (-18), Pregnant female employees**, who **must** now be **individually** risk assessed for any danger to their health or that of the unborn child. **'Children'** on work experience (14-16)

⁹ See 'How to Make a Report' on page 19

Safety Induction and Training

All new learners and employees will be given **planned induction training** which will include this Health and Safety Policy Statement, the fire evacuation procedures, the safeguarding procedures, and other essential safety information about their centre. The Health & Safety checklists must be completed with learners to ensure their understanding and responsibilities for their health and safety. New staff and learners **should** be given a tour of the workplace and made aware of the emergency escape routes.

The confidential medical questionnaire is completed by new employees and learners to give first aiders advanced warning of any health conditions people may have and any medication they may be taking. This assists us in first aid treatment, lets us give essential information (e.g. concerning allergies) to paramedic staff and provide them with contact names and addresses (e.g. next of kin).

Centre/training managers should assess requirements for further safety / safeguarding training of their staff and then liaise with senior managers / directors. Depending on the need, either in-house or external training sessions or courses can be arranged.

Health and Safety Management Records

Effective safety management requires a certain amount of record keeping. CTG workplaces are regularly visited by auditors from external organisations who will want to see documents proving that our systems work in practice. Computer based records are usually acceptable. Regular audits of these records should take place including those on learners' files e.g. induction training record and reviews.

The minimum **(most legally required)** records are:

1. An Accident Book / database (**RIDDOR 2013**)
2. An equipment inventory / database (insurers may require this)
3. An equipment maintenance record (**Provision and Use of Work Equipment Regulations 1998**)
4. An inventory of potentially harmful substances, together with hazard data sheets. (**CoSHH Regulations 2002**)
5. Risk Assessments (**Management of Health and Safety Regulations 1999**)
6. Portable electrical equipment tests (**Electricity at Work Regulations 1989**)
7. Fire Alarm and emergency lighting test records. Fire Extinguisher servicing / inspection records. Records of fire drills (**Regulatory Reform (Fire Safety) Order 2005**)
8. Records of internal inspections and external audits; (EFA, SFA and Partners)
9. Learner records e.g. pre-placement inspection and review. Induction records (these will be required by EFA/SFA auditors and other partners)

Basic Compliance

CTG (**and the law**) requires that every workplace must have health and safety arrangements that are, at a minimum, in basic compliance with the law. This is a checklist of the basic requirements:

- **Insurance –**
CTG Employers Liability and Public Liability Insurance covers present and additional staff, learners, volunteers and premises. All policies are renewed annually.
- **Statutory Displays: in a prominent place –**
Health and Safety Law poster, Health and Safety Policy Document, and Employer's Liability and Public Liability Insurance Certificates.
- **Optional displays –**

Fire extinguisher inspection certificates, fire safety inspection certificates, Risk assessments.

- **Accidents –**
Each site **must** have a suitable accident book or Electronic database.
- **First Aid –**
There **must** be appointed first aiders, one for every fifty people. A deputy is usually needed to cover absence and holidays.
- **Fire Safety –** there **must** be:
A means of raising the alarm
A means of fighting fire: e.g. fire extinguishers or other devices
A means of escape: a **safe** evacuation route and **unobstructed** fire exits.
- **Sanitation –**
There **must** be sufficient WCs / Urinals for the number of people on site. Male and female WCs must be private; they must be lockable from the inside. Hand washing facilities must be available.¹⁰
- **Welfare –**
Drinking water **must** be available; either fresh tap water or a water cooler. There **must** be a place to eat food away from the workstation. These areas **must** be clean and free of contamination. Ideally there **should** be facilities to heat food or drink.
- **Statutory Warning and Advisory Signs –**
First aid Station: a white cross on green background
First Aiders: a notice giving their names and locations
Fire Extinguishers: colour coded notice above the extinguisher giving its type and the kind of fires it can be used against
Fire escape or evacuation routes: green 'arrow' signs
Fire Exits: the green 'running man' sign
Hazard warnings: use standard pictogram signs as needed.
- **Health and Safety Record –**
Legally required records **should** be kept in a convenient place for the use of Centre Managers and safety Advisors and for inspection by external organisations.

Regular inspections, using the objective standards that we use for placements, will show whether compliance has been achieved or is being maintained

THE SAFE LEARNER

The 'Safe Learner' Concept / Blueprint

The 'safe learner' concept was first introduced by LSCs in 2002 and continues to underpin Government Education legislation. It is an evolving concept, but in simple terms means that learners, through the quality of their learning experience:

- Gain an understanding of the importance of health and safety.
- Understand how hazards are identified and how risks are controlled.
- Develop a set of safe behaviours – i.e. learners play an active part in the process and develop a practical, transferable skill from their experience.

¹⁰ WCs **need not** be segregated for men and women, so long as each cubicle (including hand wash area) is totally enclosed and lockable from the inside.

As such, the safe learner concept has become embedded in Funding Bodies approach to learner health and safety. In addition, the concept has wide support – including the DCSF and the HSE.

As well as promoting an important transferable skill, it is intended that the promotion of risk awareness may help to reduce the number of accidents to young people on ESFA funded programmes.

The blueprint has 6 key elements that are supported by inputs that will contribute to positive outputs.

Inputs:

Environment
Initial assessment
Learning Plan
Supervision
Information, Instruction and Training
Reassessment

Outputs:

Hazard Awareness
Understanding
Confidence
Contribution
Behaviours

The overriding difficulty is not in giving health and safety messages or training to learners, it is ensuring a satisfactory transfer of learning to the workplace and an impact on safe behaviour.

Our Statement of Intent

CTG seek to create and maintain a safe, healthy and supportive learning environment for its learners.

The safe learner blueprint is integrated into induction and learning programmes. An initial assessment is carried out to identify any individual additional health, safety and welfare help or support required, and a Learner Commitment Statement is produced as a result. 'The Learner Guide to Safeguarding @ Central' is be issued to every learner at Induction.

CTG will ensure that all learners on SEFA funded training programmes will only be employed/complete work experience for employers who fulfil their legal obligations concerning health and safety in the workplace.

CTG will, therefore, visit and inspect the workplace of all new CTG employers to confirm that the employer meets their legal obligations concerning health and safety,

CTG will carry out a pre-placement inspection before commencing working in partnership with sub-contractors and employers. This will be documented. Thereafter, the employer will be subject to comprehensive reviews. This applies to all employers, including those hosting work experience learners.

The learner will be reviewed regularly while they are at college and whilst on placement. At every review any changes to their working arrangements at their company will be assessed. They will also be monitored for their developing understanding and awareness of key health, safety and welfare issues on an on-going basis.

The learner will be asked whether they have had any workplace accidents and whether these have been reported. These responses will be documented.

Supervision

Supervision is probably the most important single preventable measure to protect employees and learners (sometimes even from their own acts and omissions), particularly when they are young and inexperienced. In addition, supervisors and managers play a vital role in imparting health and safety information and developing the learner into a safe and healthy worker who is capable and competent.

Supervision:

- Must be competent.
- The level of supervision should be determined following a risk assessment, in particular when carrying out a young person's risk assessment.
- Supervision must be appropriate to the individual learning taking into account all circumstances.

CTG will:

- Ensure competent and appropriate levels of supervision for employees and learners on our programmes and working within our premises
- Comprehensively monitor supervision arrangements for learners on placement or on work experience (where we, obviously, do not have direct control of the day to day working environment).
- Issue the Child Protection and Safeguarding policy that covers: Child protection and Vulnerable Adults, Designated Staff, Recruitment and Selection Procedures, Mentoring and Dealing with and Reporting Suspicion or Allegations of Abuse of Children, Vulnerable Adults or Staff to all staff and associates of Central.

DEALING WITH HAZARDS

Many things can contribute to workplace accidents. No guide can be complete, so staff must vigilant of potential dangers. The following is a general guide to workplace hazards.

Workplace Planning

The layout of offices, workspaces and training rooms should be carefully planned and take safety into consideration. Space should be used to the best advantage so that each person has adequate workspace. The legal requirement is **11 cubic meters**.¹¹

Workspaces must be laid out so that people can move easily without knocking against desks, cabinets, sharp corners and so on. Filing cabinets and cupboards should be placed so there is room to open drawers or doors with safety.

Housekeeping and Premises

Good housekeeping is essential if accident and fire hazards are to be reduced. All sites must be cleaned regularly. If the regular cleaner is away from work for any reason, staff should pay particular attention to keeping their own workstations clear. Employees and learners are to ensure that gangways and escape routes are kept clear.

Dispose of broken glass, scalpel blades or other dangerous items with care. Do not throw them loose in the waste bin. Ask for advice from your centre manager or supervisor if in doubt. You should take special care when disposing of cloth or paper that has been used for flammable substances. Always dispose of empty tubes or containers with their lids on.

Special permission may be required for staff or learners to enter particular places; e.g. no learner is allowed in the colour mixing area of a salon without permission or supervision. Permission can only be given by an authorised member of staff.

Plant rooms and electrical intake spaces must be locked shut at all times and not used for storage of any kind.

Trips and Falls

Gaining access to high places like shelves is a common cause of falls, because people use chairs, desks, or windowsills rather than using a ladder.

¹¹ *The Workplace (Health Safety and Welfare) Regulations 1992 are concerned with workspace layout, and working environment.*

Ladders and steps must be checked periodically by visual inspection. On no account should a faulty ladder be used. Faulty ladders should be taken out of service until repaired or replaced. Notes of these inspections should be entered in the maintenance log.

The layout of workrooms and the placing of electrical equipment should attempt to minimise trip hazards arising from trailing cables and so on.

Falling Objects

To minimise hazards from falling objects, avoid overloading shelves with heavy materials or equipment. Store the heaviest items at the bottom of a cupboard or on lower shelves. Opening more than one drawer at a time may cause filing cabinets to over balance. Check shelving is robust and fit for its purpose.

Manual Handling and Lifting

Generally, about one fifth of industrial accidents are caused by bad lifting and handling. At CTG heavy and continuous manual handling is not usually called for. It tends to be one-off occasions, such as relocating equipment or furniture. This has its own special risk however, because unlike say, a warehousing company, we are unfamiliar with the hazards.¹²

People often lift by bending over at the hips; then they keep their legs straight and use their back like a crane to pull the load up. This puts immense strain on the spine and risks serious injury, through 'slipped discs' in particular.

There are six principles for lifting safely:¹³

1. Think about the lift! Position yourself close to the load facing the way you intend to move, with your feet shoulder width apart to aid balance.
2. Bend your knees, keeping your back straight but not necessarily vertical.
3. Take a firm grip of the load; don't just use your fingertips.
4. Raise your head and hold back your chin in to assist in straightening your back.
5. Elbows must be held as close as possible to the body.
6. Lift by straightening your legs, keeping the back straight at all times.

General Work Equipment

Work equipment **must** only be used by staff or learners who have been trained in its use¹⁴ it should be treated with care and **must not** be used in such a way as to cause danger.¹⁵ Equipment should be installed and used following the manufacturers' instructions. Safety features such as guards **must** be used. Faults affecting the safety of equipment should be reported immediately to the

¹² *The Manual Handling Operations Regulations 1992* are concerned with controlling the risk of injury and ill health caused by the continuous handling of heavy loads.

¹³ *Checklist for handling loads:*

Is the route obstacle free and do you have a clear space to put the load down?

Avoid carrying over long distances

Can you use a trolley or other mechanical aids?

Can you use teamwork? Unwieldy or very heavy loads can be manoeuvred by a number of people working together.

The Provision and Use of Work Equipment Regulations 1998 are concerned with the selection, suitability and maintenance of work equipment.

¹⁴ PUWER (regulations 8&9) see also additional training for young / inexperienced persons in the guidance notes.

¹⁵ Regulation 14 of the *Management of Health and Safety at Work regulations 1999* which requires employees to use any machinery, equipment, dangerous substances, transport, safety devices and means of production in accordance with any training and instructions provided by their employer.

Centre Manager or the Group Health and Safety Officer who must take the equipment out of service if it cannot be made safe.

Certain Machinery is prohibited to young people under the age of 18 or may only be used under close supervision. Centre Managers or Supervisors must ensure that these machines are identified and their use controlled.

Cutting

Take care when using knives, scissors, stapling machines, guillotines or cut throat razors. Never use knives or scissors for removing staples or opening tins. When using cutting tools, remember to cut away from the body.

Electrical Equipment

Electrical installation and repair at CTG sites must only be carried out by qualified electricians.¹⁶

Electrical equipment **must** be kept in a good condition and any defects reported immediately to the Centre Manager or Sue Irons who must take the equipment out of service if it cannot be made safe.

Routine visual inspections of plugs and cables for loose connections, breaks in the insulation or other faults are to be carried out trained CTG staff or a qualified electrician.¹⁷ All portable electrical equipment **must** be inspected and tested as fit for use: for example; hairdryers, computers, VDUs, climatizers and so on.¹⁸ **It is recommended** that these checks be carried out annually although the law does **not** in fact call for annual tests for many items, for example computers.

Company Cars / Travel

Employees who drive company cars are responsible for checking the vehicle's safety. Any fault must be reported to the line managers and recorded. Company pool cars **should** also be regularly serviced by a qualified mechanic in line with current legislation.

Safe driving is essential. Due regard is given to travel within the working day and time is allowed to travel in a safe and responsible manner between destinations. Drivers **must** obey current road safety legislation and observe good driving practices. **Individual liability** may apply if these rules are not observed.

¹⁶ *The Electricity at Work Regulations 1989 lay down requirements for the safety of electrical installations and equipment.*

¹⁷ *A Visual check is a brief look-over. Are cables, plugs and sockets undamaged? Is there any burning smell or evidence of charring?*

¹⁸ *Staff are not qualified electricians and are not expected to be. Visual checks like this can pick up most cases of potentially dangerous electrical equipment.*

Checklist for Electrical Equipment Safety.

Visually inspect the equipment before use.

Only approved safety plugs must be used.

Report frayed or damaged connections immediately to the centre manager or supervisor.

Switch off electrical equipment after use, particularly at the end of the day, unless instructed otherwise.

When removing plugs from their sockets, hold the plug to remove it, not the lead.

Extension leads must not be used unless authorised by the Health and Safety Advisor.

Do not attempt to clean or maintain any electrical equipment unless it is laid down in the manufacturer's instructions to do so.

Do not attempt to repair electrical equipment yourself. This must always be done by a qualified electrician or suitably trained technician.

Keep liquid away from electrical appliances.

Emergency Situations

The 'Pool Car Policy' in the Managers Handbook covers emergency situations, both breakdowns and accidents. There is RAC membership, details of which are kept in the glove compartment, as well as full instructions on what to do in the event of a breakdown or accident.

Hazardous Substances

CTG will only use substances regarded as hazardous by the COSHH regulations as a last resort, when every other practicable less hazardous alternative has been considered. The Centre Manager shall ensure that documented procedures detailing the correct handling, storage, disposal and first aid procedures are adopted for all such substances, and are filed and stored in the appropriate place for reference users.¹⁹

In addition, when dealing with substances that are likely to be irritants, toxic or carcinogenic, a risk assessment **must** be conducted to establish the severity factor. Appropriate action is to be taken before such substance is put into use. Information and advice on COSHH Regulations can be obtained from Sue Irons.

In certain cases, hazard data sheets and manufacturers' guidance notes from the supplier or manufacturer, should be applied for when a substance is brought into use within the organisation. Hazard sheets on bleach, photocopier and printer toners, hairdressing colours and solutions are to be kept on appropriate sites in a COSHH folder and copies made available for the Safeguarding Officer.

An inventory of hazardous chemicals used in the workplace should be made by Centre Managers, who will provide information on any associated hazards and instructions on the use, handling and disposal of them.

- Follow the manufacturers' instructions on the use, storage and disposal of chemicals.
- Ensure that you understand the toxic and flammable risks associated with any chemicals you use. (information can be obtained from the Safeguarding Officer)

Storage of Flammable Liquids

Ensure flammable liquids are stored correctly. Only small quantities of these should be kept in the workplace. They should be stored in sealed containers and they should always be stored in their original containers.

Noise

Measurement of a possible noise hazard can be made by assessing a conversation of two people standing at a distance of 2 meters. If during that time they have not raised their voice to be heard, then a meter test is not required.

Visual Display Units (VDUs)

A computer or similar workstation includes:

- The keyboard
- The VDU
- Mouse or Trackball
- The work surface
- Seating

¹⁹ *The Control of Substances Hazardous to Health Regulations (CoSHH) are concerned with the safe handling, use and storage of hazardous substances.*

Arrange these to avoid poor posture and repetitive awkward movements²⁰. When starting work with display screen equipment, adjust the height of the chair; the tilt and swivel of the monitor; and position and tilt of the keyboard for maximum comfort.

Give the workstation a quick 'once over' visual inspection. Check for unsafe cables; look to see if they are trailing dangerously or are damaged. Check also for cracked or damaged plugs. When you have switched on, you should adjust the brightness and contrast of the display to suit your individual eyesight.

A display screen 'user' is an employee who regularly uses VDU for more than one hour per day. Workstation Risk Assessments should be carried out by each user and retained with the Human Resources Co-ordinator.

Eyesight Tests for those working with display screen equipment (DSE). A 'User' may request an eyesight test. This must be arranged through the company. These tests are limited to visual capacity needed to use a display screen at work and are not comprehensive medical eye tests normally obtained from high street opticians.

Agreed costs of eye and eyesight tests will be met by CTG provided that the testing has been arranged through the company. Where a 'User' obtains a test independently and without the knowledge of CTG, even if the test is specifically related to display screen use, the company shall not be responsible for the costs incurred.

If glasses are found to be necessary, specifically to enable the use of display screen equipment by a designated 'user', the company will reimburse the cost of the single lens prescription for IT use. Evidence of the purchase must be produced and submitted on an expenses claim and validated by the Line Manager.

Personal Protective Equipment and Clothing (PPE/C)

A **risk assessment must be made** to assess the hazards and the degree of risk. PPE/C must be issued to each member of staff or learner appropriate to the level of risk identified in it, **only** if the risks cannot be controlled in some other way, the risk assessment **should** be recorded.²¹

The issue of PPE should be recorded and individuals **must** be trained in its use. The equipment should be checked regularly to ensure that it remains in good condition. Any personal protective equipment found to be damaged or lost should be replaced.²²

Employees and learners **must** use any personal protective equipment issued to them when it is necessary to do so. They **must** care for personal protective equipment issued to them and **report** any loss or damage to their Tutor / Supervisor. They **must** tell their Tutor / Supervisor about any unusual risk which may need the use of PPE not readily available to them.

Workplace Stress / Workplace Bullying

Workplace stress is a recognised source of ill health and a contributory cause to workplace accidents. A certain amount of stress, perhaps even a great deal, is inescapable from the working

²⁰ *The Health and Safety (Display Screen Equipment) Regulations 1992 are concerned with the safe installation and use of computers and other devices incorporating a display screen.*

²¹ *The Personal Protective Equipment at Work Regulations 2002, are concerned with the correct provision and use of protective equipment in hazardous circumstances.*

²² *PPE that has been supplied free of charge by an employer for use at work remains the property of the employer. It is in order for the employer to instruct that it is kept at the workplace and is not used for non-occupational purposes.*

environment²³. It becomes a health and safety issue when the stress is of greater intensity than the individual feels they can deal with, over too long duration. A harassed worker or learner is not a safe worker.

Apart from stress arising from the nature of work itself, is stress that could arise from workplace bullying or intimidation (including cyber bullying), from racial or sexual harassment or similar causes. CTG has a **zero-tolerance** policy against bullying and harassment and will take disciplinary action, including **dismissal**, against any individual found culpable of such behaviour.

Smoking, Drinking, Medication and the Consumption of Illegal Drugs.

It is illegal for anyone to partake of any of the above in and around CTG centres including private offices, corridors, staffrooms, toilets or pool cars.

Employees and learners should let their tutor / line manager know when they have been prescribed medication that may have side effects (like drowsiness in the case of many painkillers). If CTG is aware of this, then we can help to accommodate the situation (e.g. operating machinery or driving), which they are, temporarily and without blame, not fit to deal with.

It is the policy of CTG that no alcoholic drinks, illegal drugs or other narcotic substances may be brought onto, or consumed within, company premises at any time.²⁴ To do so will result in disciplinary action. Any employee or learner who attends work under the influence of alcohol or other drugs will be considered to be unfit for work and will be sent home on the grounds that they are **not** in a **safe** condition. This is to protect **their safety** as much as that of **others**.

DEALING WITH ACCIDENTS

Accidents to Employees or learners: reporting and Investigation

If an accident happens to a member of staff, a self-employed person or a learner while they are working in CTG premises, or to a member of the public visiting one of our sites, we have three main duties:

- To report the accident
- To record the accident
- To investigate the reasons for the accident.

Reporting accidents

CTG **must** report any serious accidents and workplace disease that occurs at a CTG site. This is a legal requirement under the Health and Safety at Work Act (1974) and the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations, usually known as RIDDOR '2013

The law says an **employer** **must** report the accident if an employee, learner or visitor at their premises

- Has suffered death or major injury
- Has needed treatment in hospital
- Has been off work for more than seven days as a result of the accident.

²³ This phrase does not mean that Central Training Group as an employer seeks to escape the duty to provide safe systems of work and to risk assess hazards.

Stress is a workplace hazard like any other, only very much more difficult to quantify objectively as a hazard.

²⁴ This **does not** necessarily rule out company and employee celebrations. In such cases seek **express permission** from the Centre Manager or the responsible director.

Best Practice though, is to hold such celebrations out of the workplace.

For all such serious accidents at CTG sites – an Accident Report Form (F2S08) must be completed. Under RIDDOR 2013, the responsible Director must immediately notify the appropriate authority. Accidents can be reported immediately over the telephone and the form can be completed and sent within 10 days.

In the event of an accident at one of CTG's centres:

- The accident **must** be recorded in the accident book, especially if first aid has been given. This **must** be done even if it is not serious enough to become a 'reportable' accident under RIDDOR²⁵
- A 'reportable' accident must be notified within 24 hours to the directors responsible for health and safety, Martin Kolton/Sue Irons

If the casualty is a learner:

- A report must be made to the Education or Skills Funding Agency within one day.
- If the learner is employed, the accident should be reported to their company.

Any serious 'reportable' accident **must**, by definition be reported to the enforcing authority under RIDDOR as described above.

Occupational Diseases

Obligations placed on companies to report cases of various occupational diseases as they may affect staff or a learner, are broadly similar to those detailed above for accidents.²⁶ Should a case of a reportable industrial disease come to light, it must be reported to the enforcing authorities on Form 2508A- the Disease Report Form.

Reporting Accidents

Any accident to a member of staff or learner must be properly recorded. Learners are treated just the same as employees as far as accidents are concerned. All accidents must be entered into the centre's accident book even where no injury was caused. These are called 'near misses'. Recording them helps show whether a potentially dangerous situation is brewing which may lead to injury to staff, damage to equipment and materials or financial loss.

Accidents to learners in the workplace

If a learner has an accident while working at their employer's site, the duty of reporting and recording the accident falls upon **their employer**

The employer must also report the accident to CTG within **one day** of the accident. CTG must, in turn, inform the Education Skills Funding Agency.

Accidents should be reported to CTG if it is any more than the most trivial case. We need to know whether, for example, first aid has been necessary or if the learner has had to go to hospital or been seen by a doctor. It should be recorded in the employer's accident book and in CTGs. The accident should be reported even if the learner attends work the next day and appears to be fit.

²⁵ **Accident Books** are a requirement of the 1998 Social Security Regulations. These apply to premises where 10 or more people are employed at any time. Employers are required to record all work-related injuries, regardless of their severity in a centrally held accident book. The record may be made in an approved accident book (BI 510 – available from the Stationary Office) or in an equivalent format, providing that the specified details are completed. This can include databases of accidents held in a company IT system. The records must be kept for a period of three years from the date of the last entry.

²⁶ In the context of Central Training Group's occupational areas the most likely 'reportable' occupational disease to be aware of is **Dermatitis**.

When workplace review visits are carried out by CTG, staff must check whether there have been any unreported accidents to the learner. CTG must record any previously unreported accidents and inform the contract partners.

Investigating Accidents

When a serious accident has happened the causes should be properly investigated, so that steps can be taken to prevent it happening again. In-house investigation, at a placement site or at CTG, should begin as soon as possible after the accident and should include:

- Interview reports or statements by the victim
- Interview reports or statements by the witnesses
- Details of the site, the plant and equipment involved
- Details of any substances or materials involved
- A narrative 'step by step' description of what actually happened.

This is the responsibility of the employer if the accident happens in the workplace or the responsibility of CTG if the accident takes place at one of its centres. However, the Education Skills Funding Agency for whom we provide training make it obligatory, under contract, for us to also investigate accidents. CTG staff may need to visit the company concerned, as may any partners' Health and Safety Advisors, depending on how serious the accident is.

HOW TO MAKE A REPORT

Reports can be made in a variety of ways:

- By telephone to 0845 300 9923 Monday to Friday 8.30am – 5pm
- By Fax to 0845 3009923
- By e-mail to riddor@natbrit.com
- By internet at www.riddor.gov.uk
- By Post to:

Incident Contact Centre
Caerphilly Business Park,
Caerphilly
CF83 3GG

The report will then be forwarded to the appropriate enforcing authority. A copy of the report made to the ICC will be sent back to the duty holder for correction if necessary. A record of reported incidents must be kept for inspection by visiting officers

HEALTH AND SAFETY INFORMATION

Risk Assessment

Risk assessment is a tool for managing health and safety at work. Many regulations have come into force that say employers **must** examine the hazards employees (and learners) may be exposed to in their day-to-day work. Risk assessment has become very much the preferred approach to helping the management of safety at work.

Employers **must** assess the hazards to find out the likelihood that they could harm employees. Once this has been done, control measures can be introduced to cover any outstanding risks that are not already controlled.

Risk assessments are called for by the management of Health and Safety; Electricity at Work; CoSHH; PPE; and Display Screen Equipment Regulations. A risk assessment is also required under Fire Safety legislation.

Risk assessments should not be over complicated. The law simply says they must be 'suitable and sufficient.' A risk assessment under management of safety regulations would probably take into account electrical hazards requiring assessment under the Electricity at Work Regulations; it does **not** need to be done **twice**.

Many groups of people at CTG are doing very similar tasks so one can carry out a **generic** assessment that can cover a whole work group e.g.: 'tutors', 'administrative staff' and so on.²⁷

Hazard is the potential something has to cause harm. How can it be measured? One simple scale could be:

MAJOR	the hazard could cause death or major injury;
SERIOUS	the hazard could cause serious injury where people may be off work for more than three days;
SLIGHT	the hazard could cause injuries where people may be off work for up to three days.

Risk is the **severity** of the hazard as described above; measured against how **likely** it is to occur. Risks could be described as being **HIGH, MEDIUM** or **LOW**.

Controls describe the measures that have been adopted to reduce the risk. Controls can be anything from hardware solutions, protective clothing, training or simply changes in procedures.

ENFORCEMENT AND LIABILITY

Duties under Health and Safety Law

Duties under health and safety law may be:

- **absolute** duties
- duties qualified by the term '**practicable**'
- duties qualified by the term '**reasonably practicable**'.

Absolute duties **must** be complied with without exception. **Practicable** duties **must** be complied with if technically possible **regardless of cost**. **Reasonably practicable** duties **must** be complied with taking into account the level of risk and the cost of eliminating them.

Enforcement

The enforcing authority for CTG workplaces is the Environmental Health Department of a Local Authority covering the district the workplace is located in. This is likely to be the case for the majority of placements too, e.g. hairdressing salons. The Health and Safety Executive enforces the legislation in the case of heavy industrial workplaces.

The enforcement regime is one of inspection. Inspectors may be called in by someone **reporting** a concern to them or if a serious accident / case of occupational disease occurs. The issue of Improvement Notices or, in more serious cases, Prohibition Notices, compels corrective action. Failure to comply then usually triggers legal compulsion i.e. **prosecution**.²⁸

Breaches of health and safety law are prosecuted by the enforcing authority in the criminal courts; i.e. the Magistrates' Court or the Crown Court.

²⁷ Generic risk assessments **cannot** be made for Young Workers, Children or Pregnant Women. These **must** be individual assessments.

²⁸ Failure to comply with these notices will result in prosecution and the imposition of large fines or terms of imprisonment for the persons concerned.

Liability

Employers are liable for the actions of their employees **providing** they are acting in the course of their employment. Employers are **not liable** for things done that are not part of their employment or are done outside employment.

Workers **can** be prosecuted individually but this would only happen where the employee had failed to carry out their duties with proper care or had failed to carry them out at all.²⁹

Actions can also be brought under **civil law**: e.g. claims for damages or compensation. Usually the claimant will be trying to prove something like:

- failure of duty of care (e.g. to a learner)
- breach of statutory duty (i.e. a breach of health and safety regulations)
- negligence

Responsibility for Workplace Accidents

Responsibility for an accident would lie, in the first place, with the **employer** at the placement firm and any action would, most likely, be directed at them. Secondly, if CTG were culpable in any way, then action would be brought against the company as an **employer**, not the individual employee. This would be the case, **so long as** the employee had carried out their tasks (e.g. inspections and reviews) in good faith and according to the employer's (i.e. CTG's) procedures and instructions. Please see also the next section.

Cases where Individual Liability of Employees applies

Vicarious Liability³⁰ generally applies, but there are some exceptions under the **Health and Safety at Work Act 1974** and under the **Management of Health and Safety at Work Regulations 1999** where **individual liability is specified**.

- **Section 7 of the HSW Act 1974.** Individual employees **are** liable for actions arising from **not** taking reasonable care for their **own** safety and the safety of **others** who may be affected by their acts or omissions.
- **Section 8 of the HSW Act 1974.** Individual employees **are** liable for actions arising from their **recklessly interfering** with any equipment or measure provided for health and safety and **not co-operating** with their employer in respect to any measure or provision provided for health and safety.

²⁹ A person can be prosecuted under the HSW Act, independently of whether or not an improvement or prohibition notice has been served by a Health and Safety Inspector. The one may (but need not) precede or follow the other.

This would happen, normally only in the case of the most flagrant breach of safety law. Inspectors are under no obligation to warn an offender of the intention to begin proceedings, although in practice prosecution is usually **only** used when warnings and persuasion have failed to secure compliance.

³⁰ The legal doctrine of vicarious liability means that if an employee, **while acting in the course of employment**, injures another, including a member of the public, the **employer** rather than the employee will be liable for that injury. This is because the employer has **ultimate control** of the employee and their work.

This is the basis of most civil claims for compensation.

It makes sense, because the **employer** is likely to have the resources to fund any compensation the court may award (under a firm's compulsory **Employers Liability Insurance** policy), whereas the individual employee will, most probably, not have.

The Employee **can** be sued instead of, or as well as, the employer, if they have been **negligent**.
See also important note on next page.

- **Regulation 14 of the 1999 MHSW Regulations, and section 7 of the HSW Act 1974.** Employees **are** individually liable for their actions arising from **not** using **all** work items provided by their employer **correctly**; in accordance with their training and the instructions they received to use them safely.
- Employees **are also** liable for actions arising from failure to notify their employer of any situation that gives risk to serious and immediate danger and also of any shortfalls in health and safety arrangements, **even if there is not a serious and imminent risk.**
- Where a health and safety **offence** is committed by a body corporate, **(e.g. a company)** a senior manager **may** also be **individually**³¹ liable. An individual can be charged by the prosecuting authority if an offence by a body corporate is due to the **neglect** or **act** of that individual.

Fire Precautions

Management of Health and Safety at Work and Regulatory Reform (Fire Safety) Order 2005

Legislative changes made in October 2003 mean that employees are now civilly liable for injury, illness or death caused to any person as a result of their failure to report a health and safety concern.³²

The liability imposed by this new provision is unprecedented³³ in English law and, additionally, arises not only where the employee had concerns but also where he or she should have had.

This very much strengthens and makes more urgent the duty of an employee to report hazards and is one reason why hazards are given extensive treatment in this Policy.

CENTRAL TRAINING GROUP SAFETY TEAM

Responsible Director for Management of Health and Safety

Martin Kolton: Director

Responsible for general oversight of Health and Safety

Sue Irons: Operational Director of Recruitment (Safeguarding Champion)

Qualifications:

NEBOSH Certificate

C.I.E.H Basic Health and Safety

Level 2 Risk Assessment Training: City and Guilds

Level 2 Safeguarding

Level 2 Child Protection

Level 3 Safeguarding

³¹ 'Limited' liability applies.

³² Note that this liability is laid on employees not on people outside a company, e.g. external inspectors and auditors.

³³ In that an individual can be sued not for what they have done but: - for not acting (sued for what they haven't done) – For not acting when they should have done – Even if there is not an imminent risk (but presumably there was later on).

Appointed Health and Safety Advisors at:

Central Training Group / Central Graphics Academy
Southend Centre:
44 Alexandra Street, Southend on Sea, Essex. SS1 1BJ

Central Hairdressing Academy at Southend:
32 Alexandra Street, Southend on Sea, Essex. SS1 1BU

Central Hairdressing Academy
London Road Studio:
112-114 London Road, Southend on Sea, Essex. SS1 1PQ

Central Training Group,
Cambridge Heath Road Centre:
519-523 Cambridge Heath Road, London. E2 9BU

Joshua Galvin Training Academy
1 Hollybush Gardens, Bethnal Green, London. E2 9QY

All centres have qualified first-aiders or appointed persons and Fire Marshalls.

SOME SOURCES OF INFORMATION

Andrea Adams Trust

<http://www.andreaadamstrust.org>

Trust set up to campaign for effective industrial legislation to protect employees from workplace bullying and abuse of power in the workplace.

Department of Health

<http://www.dh.gov.uk>

Website of the Department of Health containing information about social health policy and reportable diseases.³⁴

EMAS – Employment Medical Advisory Service

EMAS Regional Office – Home Counties³⁵

Wren House, Hedgerows Business Park, Colchester Road, Springfield, CHELMSFORD. CM2 5PF

Tel: 01245 706200 Fax: 01245 706222

Covering: Essex (except parts covered by London and the South East Regional Office), Norfolk, Suffolk

EMAS Regional Office – London

Rose Court, 2 Southwark Bridge, LONDON. SE1 9HS

Tel: 020 7556 2100 Fax: 020 7556 2109

Covering: London only.

Health and Safety Executive (HSE)

<http://www.hse.gov.uk>

³⁴ For general information about UK government; regulations, benefits, tax, tax credits and links to find out more specific information about almost anything try: www.direct.gov.uk this is a very comprehensive website. It contains good leads to subjects and to local authorities.

³⁵ **NOTE:** These are the EMAS addresses to fill in on the statutory Health and Safety poster.

Works to ensure that risks to people's health and safety from work activities are properly controlled. Contains many downloadable publications including most of the common free leaflets for distribution. You can also order priced publications on-line.
Rose Court, 2 Southwark Bridge, LONDON. SE1 9HS

Tel: 020 7556 2100 Fax: 020 7556 2109

HSE infoline: 08701 545 500

E-mail: hseinformationservices@natbrit.com

Royal Society for the Prevention of Accidents (RoSPA)

<http://www.rospace.co.uk>

A registered charity that provides information, advice, resources and training, and promotes safety in all areas of life, including work.

Safe Learner

www.safelearner.info

SFA Website about the safe learner concept. It contains downloadable documents including 'Be Safe' in Microsoft Word format for photocopying.

Trade Union Congress

www.tuc.org.uk

Website of the TUC. Contains good links to various websites concerned with health and safety.

UK National Work Stress Network

<http://www.workstress.net>

The website for the UK National Stress Network. It offers advice, information and contacts.

Union

<http://www.unison.org.uk/safety/index.asp>

Website of Unison, the public service workers' union. Has Comprehensive health and safety information and free subscription to HS bulletins.

Child Protection and Safeguarding Agencies are listed within the Mentor's Handbook and displayed on all IAG boards throughout Central.