



# Real Education Health and Safety Policy

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# Section 1: The Policy

## 1.1 Introduction

The Directors of R.E.A.L. Education Limited, R.E.A.L. Independent Schools, and R.E.A.L. Alternative Provision Schools (hereinafter referred to as `the Company`) place great importance on, and are committed to, ensuring the health and safety of all employees and other persons who may be affected by the work activities of the Company. This policy document has been prepared in accordance with the requirements of Section 2(3) of the Health and Safety at Work etc. Act 1974 and other relevant legislation, and is issued for the direction, guidance and information of all employees, suppliers, contractors, customers and members of the public who may be affected by the work activities of the Company. The objectives, aims and targets of the policy are based on the following principles:- "ALL INJURIES CAN BE PREVENTED" and "ALL ACCIDENTAL LOSSES CAN BE CONTROLLED". This policy document applies to the following sites, premises or areas of the business:-

Head Office - Ilkeston  
R.E.A.L. Independent Schools  
R.E.A.L. Alternative Provision School  
All Alternative Provision sites  
All other remote locations used by the personalised programmes team.

This policy document also applies to employees working on Company business on other premises, sites or situations.

## 1.2 Health and Safety Policy Statement

This is the Health and Safety Policy Statement of R.E.A.L. Education Limited, R.E.A.L. Independent Schools and R.E.A.L. Alternative Provision School (hereinafter referred to as `the Company`) as required under Section 2(3) of the Health and Safety at Work etc. Act 1974.

It is the general policy of the Company to ensure the health, safety and welfare at work of employees, contractors, visitors and members of the general public who may be affected by its work activities.

Furthermore the Company will endeavour to comply with its legal duties, responsibilities and obligations under the relevant health and safety legislation, together with any relevant codes of practice and guidance notes issued by the Health and Safety Executive (HSE).

The Company will attempt to achieve these objectives by:-

- (1) Providing and maintaining a working environment that is, so far as is reasonably practicable, safe and without risks to health, and complies with all relevant legal requirements.
- (2) Providing and maintaining suitable and satisfactory facilities and arrangements for the welfare at work of employees.
- (3) Providing and maintaining, so far as is reasonably practicable, premises and other places of work that are safe and without risks to health, including safe means of access and exit.
- (4) Ensuring, so far as is reasonably practicable, that plant, machinery, equipment or appliances for the time being on the company premises, or otherwise used by employees, are safe and without risks to health.
- (5) Providing such information, instruction, training and supervision as is necessary to ensure, so far as

reasonably practicable, the health and safety at work of employees.

(6) Ensuring that the use, handling, storage and transport of articles and substances are, so far as is reasonably practicable, safe and without risks to health.

(7) Consulting with employees on a regular basis regarding matters of health and safety.

(8) Identifying all reasonably foreseeable hazards and assessing the associated risks with a view to eliminating, reducing or controlling them.

(9) Reviewing and up-dating of this policy on a regular basis.

(10) Ensuring that all employees have access to a copy of this policy.

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## Section 2: Company Organisation

### 2.1 Introduction

All persons within the Company must be aware of the lines of communication and levels of responsibility that exist to ensure that health and safety matters are dealt with effectively and efficiently.

The management structure shown relates specifically to health and safety issues and not necessarily to other management functions.

Managing Director -> Company Health and Safety Officer -> Executive Leadership Team -> Managers -> all other R.E.A.L. employees

### 2.2 Company Organisation

The board of directors will retain overall responsibility for Health and Safety throughout R.E.A.L. Education Ltd., R.E.A.L. Independent Schools and R.E.A.L. Alternative Provision School.

The director responsible for health and safety will be accountable to the board of directors in respect of the implementation and oversight of health and safety policy throughout the company.

Learning managers, vocational programme managers, the off-site safety coordinator and the head office safety coordinator will all be accountable to the director responsible for health and safety. Each of these named positions within the company will have their own health and safety responsibilities in respect of health and safety and will have duties to that effect.

All other employees will be accountable to one of the respective afore named positions, depending on their role within the company.

## 2.3 Responsibilities of the Managing Director

In order to ensure that health and safety is effectively managed within the Company the Managing Director shall:

- (1) Be responsible for ensuring the establishment of an effective Health and Safety Policy within the Company and for publicly supporting all persons carrying out the policy and its objectives.
- (2) Ensure the periodic review and appraisal of the effectiveness of the policy, and ensure that any necessary changes are made.
- (3) Ensure that a strategy plan is prepared for the continual management of health and safety as part of the business objectives of the Company, including a system for the regular monitoring, review and development of the plan.
- (4) Ensure the appointment of suitable and adequate `competent persons`, as required under the Management of Health and Safety at Work Regulations 1999, together with the provision of the necessary finance, materials and other assistance to enable the effective carrying out of the associated functions and requirements.
- (5) With the assistance of the competent person/s, measure, appraise and where necessary, correct the company`s safety performance.
- (6) Ensure that the Company Health and Safety Policy and the programme of implementation is understood at all levels through the commitment of adequate training sources to that programme.
- (7) Ensure that responsibility for health and safety is properly assigned and accepted at all levels and that these areas of responsibility are periodically reviewed.
- (8) Ensure that suitable and adequate risk assessments are carried out in accordance with current legislation.
- (9) Ensure that systems are in place to provide adequate levels of safety, organisation and welfare/first aid facilities on all sites.
- (10) Attend safety committee meetings or arrange for a senior manager to act on his/her behalf.
- (11) Personally undertake health and safety training and, where necessary, periodically review and update his/her level of awareness of health and safety.

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## 2.4 Responsibilities of Directors

In order to ensure that health and safety is effectively managed within the Company the Directors shall:

- (1) Ensure the establishment of an effective Health and Safety Policy within the Company and publicly support all persons carrying out the policy and its objectives.
- (2) Ensure the periodic review and appraisal of the effectiveness of the policy, and ensure that any necessary changes are made.
- (3) Ensure that a strategy plan is prepared for the continual management of health and safety as part of the business objectives of the Company, including a system for the regular monitoring, review and development of the plan.
- (4) Ensure the appointment of suitable and adequate `competent persons`, as required under the Management of Health and Safety at Work Regulations 1999, together with the provision of the necessary finance, materials and other assistance to enable the effective carrying out of the associated functions and requirements.
- (5) With the assistance of the competent person/s, measure, appraise and where necessary, correct the company`s safety performance.
- (6) Ensure that the Company Health and Safety Policy and the programme of implementation is understood at all levels through the commitment of adequate training sources to that programme.
- (7) Ensure that responsibility for Health and Safety is properly assigned and accepted at all levels and that these areas of responsibility are periodically reviewed.
- (8) Ensure that suitable and adequate risk assessments are carried out in accordance with current legislation.
- (9) Ensure that systems are in place to provide adequate levels of safety, organisation and welfare/first aid facilities on all sites.
- (10) Attend safety committee meetings or arrange for a senior manager to act on his/her behalf.

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## 2.5 Responsibilities of Managers

The Managers and Supervisors within the Company shall:

- (1) Familiarise themselves with the Company Health and Safety Policy and their responsibilities under the relevant health and safety legislation.
- (2) In conjunction with the Safety Co-ordinator/s, identify all risks to health and safety within their department or section and take suitable and adequate measures to eliminate, reduce or control those risks.
- (3) Ensure that employees and other persons within their department or section are provided with suitable and adequate information, instruction and training for the tasks they are required to perform.
- (4) Ensure that all employees in their department or section are fully aware of the procedures in the case of fire or other emergency.
- (5) Ensure that all employees in their department or section know the whereabouts of first aid facilities and the names of first aiders.
- (6) Ensure that safe practices in their department or section are continually developed to ensure maximum safety for all under employees and other persons.
- (7) Ensure that adequate supervision is provided or available at all times, particularly where young or inexperienced workers are concerned.
- (8) Carry out the investigation of all accidents, promptly, to discover the causes and take immediate action to eliminate a recurrence.
- (9) Complete accident report forms for their department or section for all accidents involving injury, damage to company property or lost time.
- (10) Ensure that any required safety equipment / safety devices are always used, properly adjusted and maintained.
- (11) Ensure that all defects in their department or section are promptly recorded and rectified. Where the defect involves the safety of machinery / office equipment, that it is immobilised until repaired.
- (12) Ensure that any relevant targets set by the Company are made known to employees and that achievements of targets are identified.

## 2.6 Responsibilities of the Safety Co-ordinator/s

In order to ensure that health and safety is effectively managed within the Company the Safety Co-ordinator/s shall:

- (1) Be responsible for overseeing the implementation, application, monitoring and review of this policy across the areas of his/her responsibility.
- (2) Ensure that there is a system of management of health and safety in place whereby all relevant hazards are identified and that the associated risks are, so far as is reasonably practicable, eliminated, reduced or controlled.
- (3) Establish and maintain systems of communication in respect of health and safety for all areas of his/her responsibility.
- (4) Periodically inspect all areas of his/her responsibility to ensure that health and safety is being effectively managed.
- (5) Periodically report to the Director responsible for Health and Safety or other relevant line manager, on all aspects of health and safety as it affects the company's operations.
- (6) Ensure that the Company management/employees are kept up to date with current health and safety legislation and best practice.
- (7) Ensure that the quality of health and safety training is of a high standard and is achieving the purpose for which it is intended.
- (8) Ensure that regular emergency procedures and drills are carried out at all company premises.
- (9) Produce safe systems of work for all activities that may constitute a risk to the health and safety of employees and/or other persons.
- (10) Evaluate the documentation and outcomes of accident/incident investigations and conduct additional investigations, as and when required or when considered necessary.
- (11) Organise, attend and supply information and material for safety committee meetings, as and when required.
- (12) Liaise with employees on all matters concerning health and safety at work to the benefit of all employees and the Company.

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## 2.7 Responsibilities of Employees

In order to ensure that health and safety management within the Company is effectively implemented and carried out all employees shall:

- (1) Familiarise themselves with and conform to the Company Health and Safety Policy at all times.
- (2) Conform to all relevant company rules and regulations made in the interest of health, safety or welfare.
- (3) Not misuse any equipment issued in the interest of health, safety or welfare, e.g. goggles, hearing protection, protective clothing, safe systems etc.
- (4) Ensure that accidents and incidents are reported promptly and fully to the appropriate person, manager or supervisor.
- (5) Keep all work areas clean and tidy.
- (6) Comply with any instructions issued by their manager or supervisor.
- (7) Comply with any instruction issued by a Principle Contractor or his representative at construction sites.
- (8) Where charged with supervising trainees, ensure they are capable of undertaking any task required of them, and to instruct them in general health and safety matters applicable to the task or trade.
- (9) Comply with the legal obligations required by section 7 and 8 of the Health and Safety at Work etc Act 1974 and Regulation 14 of the Management of Health and Safety at Work Regulations 1999, as follows:

Section 7 of the Health and Safety at Work Act requires every employee while at work:

- (a) To take reasonable care of his/her own health and safety and that of other persons that may be affected by his/her acts or omissions; and
- (b) To co-operate with his/her employers and others to comply with health and safety legal requirements.

Section 8 of the Health and Safety at Work Act requires employees not to misuse anything provided in the interests of health, safety or welfare.

Regulation 14 of the Management of Health and Safety at Work Regulations 1999 requires that:

- (a) Every employee shall use any machinery, equipment, dangerous substance, transport equipment, means of production or safety device in accordance with any training or instruction provided.
- (b) Every employee shall inform his employer or person responsible for health and safety of any situation which represents a serious and immediate danger or any shortcomings in the arrangements for health and safety.

Failure to comply with health and safety legal requirements can lead to prosecution.

Further information is available from the Health and Safety Poster - `Health and Safety Law - What you should

know, or the equivalent HSE leaflet.

## **2.8 Responsibilities of Visitors and Contractors**

### **Visitors**

In order to ensure that health and safety management within the Company is effectively implemented and carried out all visitors shall:

- (1) Report to the Company reception or site office upon arrival and leaving.
- (2) Comply with the Company Health and Safety Policy and any relevant rules and procedures.
- (3) Report immediately any injuries or damage incurred by them to the Company.

### **Contractors**

In order to ensure that health and safety management within the Company is effectively implemented and carried out all contractors and their employees shall:

- (1) Comply with the Company Health and Safety Policy and any relevant rules and procedures.
- (2) Comply with all relevant legal requirements, codes of practice and guidance relating to their operations and work activities.
- (3) Ensure that their own company's health and safety policy and relevant safe working procedures are made available before any work commences and during the period of the work.
- (4) Ensure that any plant or equipment brought onto the company's premises is in a safe condition and is maintained in accordance with any relevant regulations or codes of practice.
- (5) Ensure that they do not alter or misuse anything provided for their use or interfere with any plant or equipment on the site, unless authorised by the Company.
- (6) Provide information and assessments of noise levels and other risks arising from plant, equipment or operations brought onto the company's premises or site.
- (7) Report to the Company reception or site office upon arrival and leaving.
- (8) Report immediately any accidents or incidents resulting in injury or damage to the Company.

## **Section 3: General Arrangements**

### **3.1 Introduction**

This section defines the standards, rules and procedures of the health and safety related issues and areas of risk that apply to the company's work activities.

It is the responsibility of all employees to observe these rules and procedures and to conduct themselves and

carry out their work in a safe and reasonable manner.

Failure to comply with the following arrangements could render employees liable to disciplinary procedure or criminal prosecution.

The Company recognises that it is not possible to prepare in written form every safety rule that applies to the work activities and to employees as circumstances may vary depending upon the nature of work.

The detailed arrangements for controlling accidental loss, specific procedures and information may also be set down in a safety manual.

Each department may also be required to develop procedures in relation to the specific work activities and tasks that are carried out.

All tasks will require the persons in control to apply `planning` and `monitoring` to the activities.

**PLANNING:** Prior to commencement of work, the person in control of any task, must determine which of these arrangements apply, and ensure that the appropriate materials, equipment and procedures are available to enable them to be implemented.

**MONITORING:** It is essential that the persons in control of any task ensure that the standards are maintained throughout the life of that task, therefore requiring standards to be monitored on a continual day to day basis.

It should also be noted that any statutory references and guidance information referred to in the arrangements is not to be considered as an exhaustive list but merely a guide. Additional requirements may apply depending on local circumstances and conditions.

## **3.2 Risk Management**

The Company recognises that it has a responsibility to provide a safe and healthy working environment and acknowledges that this includes ensuring that all significant risks arising from work activities are adequately managed.

The Company will endeavour to comply with the relevant legal requirements, as contained within the Management of Health and Safety at Work Regulations 1999 and other applicable legislation, and with the specific Approve Code of Practice (L21) and guidance notes (HSG 65) issued by the Health and Safety Executive.

In particular the following rules and procedures will be applied in relation to this area or work activity:

(1) The Company will institute a programme of hazard identification and risk assessment of all its activities in order to eliminate, reduce or control, so far as is reasonably practicable, any harm or danger to employees or other affected persons.

(2) All risk assessments will be fully documented and recorded.

(3) All risk assessments will be reviewed annually.

(4) All risk assessments will be monitored on a regular basis at a frequency determined by, and stated within, the assessment.

(5) All relevant employees or other persons will be informed of the significant findings of risk assessments that relate to their work activities or otherwise affect them.

## **DEFINITIONS**

## **Hazard**

A “hazard” is something that has the potential to cause harm.

## **Risk**

“Risk” is the likelihood of the harm being realised. The risk, therefore, reflects both the likelihood that harm will occur and its severity. It will generally be recorded as insignificant, low, medium or high.

## **Control Measures**

Where work activities, items or areas with significant risks are identified the risk assessment will contain details of the measures that must be applied or actions that must be taken in order to eliminate, reduce or control the risks in question and therefore allow the activity etc to be carried out safely.

These required measures or actions are referred to as `control measures`.

## **Hierarchy of Control Measures**

The following principles will be applied to adopting control measures:

- Avoiding the risks altogether
- Evaluating the risks which cannot be avoided
- Combating risks at source
- Adapting the work to the individual
- Adapting to technical progress
- Replacing the dangerous with the non-dangerous or less dangerous
- Developing a coherent overall prevention policy
- Giving collective protective measures priority over individual protective measures
- Giving appropriate instructions to employees

## **Review and Revision**

The risk assessments must be kept up-to-date and be reviewed and modified, where necessary. If changes take place which mean that the current risk assessment is no longer valid or that it can be improved, the assessment must be reviewed. In all cases, risk assessments will be reviewed on a regular annual basis.

## **Record Keeping**

All significant findings of risk assessments and subsequent monitoring must be recorded. The records must include:

- The significant hazards identified in the assessment - those which might pose serious risk to workers or others who might be affected by the work activity if they were not properly controlled
- The levels of risk associated with the hazards
- The existing or required control measures
- The people who may be affected by the risks or hazards, including any groups of employees who are at special risk
- Decisions taken as a result of the assessment

## **Information and Training**

All employees will be provided with relevant information regarding the risks to their health and safety as identified by the assessment, including information on the required control measures. Any additional training necessary in the use of safety equipment, personal protective equipment and clothing which may be introduced as a result of the risk assessment must also be provided.

Employees involved in conducting risk assessments will be given appropriate training and any additional information applicable to the particular working environment or activities that they may be assessing.

Appropriate information will also be provided to non-employees regarding the results of risk assessments and subsequent control methods that may affect them.

**The person/s within the Company responsible for implementing and monitoring the rules and procedures in this area and associated work activities will be:**

Steve Quinn

### **3.3 Safe Systems of Work and Working Procedures**

The Company recognises that it has a responsibility to provide a safe and healthy working environment and acknowledges that this includes ensuring that safe systems of work and/or safe working procedures are developed, understood and followed.

The Company will endeavour to comply with the relevant legal requirements, as contained within the Management of Health and Safety at Work Regulations 1999 and other applicable legislation, and with the specific Approve Code of Practice (L21) and guidance notes issued by the Health and Safety Executive.

In particular the considerations that will be applied in relation to the preparation and development of safe systems of work and safe working procedures will include:

- The work or tasks being carried out
- The associated potential hazards
- Any existing instructions or procedures
- Who is doing the work
- The skills and abilities of the people
- The level of control and supervision required
- The tools or equipment that are required
- The personal protective equipment required
- The associated training requirements
- Any isolation or locking-off requirements
- Any permit to work requirements
- Other activities being carried out concurrently
- Communication requirements
- Emergency planning issues
- Handover procedures upon completion
- Monitoring requirements
- Review and updating requirements

The following rules and procedures will be followed in relation to this area:

- (1) All safe systems of work and safe working procedures will be developed by the relevant manager / supervisor in conjunction with the Safety Co-ordinator.
- (2) All safe systems of work and safe working procedures will be documented in an approved format.

(3) All safe systems of work and safe working procedures will be brought to the attention of all employees and other persons that they affect.

(4) Regular monitoring of compliance with, and the effectiveness of, all safe systems of work and safe working procedures will be carried out.

(5) All safe systems of work and safe working procedures will be reviewed and amended, where necessary, on an annual basis or when significant changes in the activities or other matters to which they relate occur.

(6) All safe systems of work and safe working procedures will be reviewed and amended, where necessary, following an accident or incident arising from the related activities, or when the results of monitoring reveals problems of compliance or effectiveness.

**The person/s within the Company responsible for implementing and monitoring the rules and procedures in this area and associated work activities will be:**

Steve Quinn

### **3.4 First Aid and Medication**

The Company recognises that it has a responsibility to provide a safe and healthy working environment and acknowledges that this includes ensuring the provision of adequate numbers of trained first aiders and adequate first aid equipment and facilities.

The Company will endeavour to provide and maintain suitable and adequate first aid facilities and to comply with the relevant legal requirements, as contained within the Health and Safety (First Aid) Regulations 1981, and with the specific Approved Code of Practice (L74) issued by the Health and Safety Executive (HSE).

In particular the following rules and procedures will be applied in relation to this area:

(1) The Company will ensure that adequate and appropriate equipment, facilities and personnel are provided at all workplaces to enable first aid to be given to employees and other persons if they are injured or become ill at work.

(2) The level of provision of first aid facilities at each workplace will be determined by an assessment of the particular circumstances and risks involved.

(3) When carrying out an assessment to determine the level of provision of first aid facilities the factors that will be considered will include:

- Any significant risks present as identified within a risk assessment
- Any specific risks present eg hazardous substances, dangerous machinery
- Areas where different levels of risk have been identified
- Records of accidents or ill health
- Numbers of employees
- Employees with special problems or disabilities
- Special site location issues
- Shiftwork or out-of-hours working
- Employees who travel or work alone
- Employees on sites occupied by other employers
- Work experience trainees
- Access by members of the public

(4) Suitable and sufficient first aid boxes will be provided in all workplaces and work situations.

(5) All first aid boxes will be stocked in accordance with the outcomes of the first aid assessment. Where no

significant risks or other factors are revealed by the assessment, boxes will contain a minimum stock of the items recommended by HSE guidance.

(6) First aid boxes will be located in conveniently accessible positions in workplaces and these locations will be clearly marked.

(7) The company will ensure the appointment of suitable and adequate appointed persons and first aiders for every workplace.

(8) The numbers of appointed persons and first aiders in each workplace will be determined by the first aid risk assessment and in accordance with HSE guidance.

(9) A list of current first aiders and appointed persons will be displayed on all company notice boards or otherwise brought to the attention of employees.

(10) All appointed persons and first aiders will receive suitable and sufficient training in accordance with HSE guidance and will receive appropriate refresher training as and when required.

(11) The duties of appointed persons and first aiders will be as indicated below:

### **Duties of First Aiders**

1. To ensure the first aid facilities are available and boxes are stocked according to the issued instructions.
2. To maintain records in all of the cases that they treat.
3. To inform the company health and safety officer of any matter relating to the provision of first aid that they deem necessary.
4. To carry out the duties of an Appointed Person as appropriate.
5. To maintain a current first aid certificate.

### **Duties of Appointed Persons**

1. To take charge of situations where someone is injured or falls ill.
2. To ensure a first aider is summoned (if available).
3. To call an ambulance and/or other emergency service.
4. To give any emergency first aid treatment to the level for which they have been trained.

It Company policy that all staff who work directly with young people hold a first aid certificate. In group situations, there must always be at least one member of staff present who has an up to date first aid certificate.

### **Trained First Aiders are:**

All vocational group managers  
Head office safety coordinator  
Off-site safety coordinator  
R.E.A.L. Independent School hub employees

### **Trained Appointed Persons are:**

All R.E.A.L. Education staff  
All R.E.A.L. Independent School staff

### **Procedure for school staff administering medication to a pupil**

From time to time it may be necessary for a pupil to have medication administered by school staff. Staff will only be able to give medication to a pupil upon receipt of the medical consent form and under direction from the child's parents/carers. All medication should be handed to a member of staff at the beginning of each day and administered to the child as required. Whilst on the school site, all medication must be kept in the office and collected by the staff as required.

**The person/s within the Company responsible for implementing and monitoring the rules and procedures in this area and associated work activities will be:**

Steve Quinn

### **3.5 Accident Reporting and Investigation**

The Company recognises that it has a responsibility to provide a safe and healthy working environment and acknowledges that this includes ensuring that all accidents and incidents are reported and investigated.

The Company will endeavour to comply with the relevant legal requirements, as contained within the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR) and the Management of Health and Safety at Work Regulations 1999, and with the specific guidance (L73)(HSG 245) issued by the Health and Safety Executive .

In particular the following rules and procedures will be applied in relation to this area:

- (1) All employees are required to report all accidents to their manager / supervisor as soon as possible.
- (2) For these purposes an accident is defined as any unplanned event which may give rise to injury, ill health, property or plant damage or any other potential loss, including near misses.
- (3) All accidents involving injury must be recorded in the accident book or equivalent form of recording. This record can be made by the relevant first aider, injured person or other suitable person e.g. manager / supervisor, colleague or other appointed person.
- (4) All accidents must be recorded by the appropriate manager / supervisor on the Company Accident Report Form.
- (5) The completed accident report form must be forwarded to the relevant manager for further analysis or investigation.
- (6) All accidents must be investigated by the appropriate manager / supervisor and recorded on the Company Accident Investigation Form.
- (7) If the accident or incident is reportable under RIDDOR (see `What is reportable under RIDDOR`) the required notification procedures as detailed below must be followed by the nominated person/s within the Company.
- (8) The director responsible for health and safety will be responsible for analysis and possible further investigation of all accidents and for the production of accident statistics and reports.
- (9) Where an accident investigation reveals matters that are required to be implemented in order to prevent a recurrence, the required action must be taken immediately by the appropriate manager / supervisor.
- (10) Where an investigation reveals that immediate action is required to prevent a recurrence but circumstances dictate that it is not possible or feasible, any required interim measures to ensure the safety of the persons affected must be taken (eg disconnection of equipment).

### **What is reportable under RIDDOR?**



## **Death or Major Injury**

When an accident involves the following:

- A company employee, or a self employed person working on the company`s premises is killed or suffers a major injury (including as a result of physical violence); or
- A member of the public is killed or taken to hospital from the site of the accident;

The relevant enforcing authority or Incident Contact Centre must be notified without delay (eg by telephone or by submitting an online form, available on the HSE website).

## **Reportable Major Injuries**

The list of 'specified injuries' in RIDDOR 2013 replaced the previous list of 'major injuries' in RIDDOR 1995. Specified injuries are:

- fractures, other than to fingers, thumbs and toes;
- amputations;
- any injury likely to lead to permanent loss of sight or reduction in sight;
- any crush injury to the head or torso causing damage to the brain or internal organs;
- serious burns (including scalding) which:
  - covers more than 10% of the body; or
  - causes significant damage to the eyes, respiratory system or other vital organs
- any scalping requiring hospital treatment;
- any loss of consciousness caused by head injury or asphyxia;
- any other injury arising from working in an enclosed space which:
  - leads to hypothermia or heat-induced illness or
  - requires resuscitation or admittance to hospital for more than 24 hours.

## **Over-seven-day Injuries**

If there is an accident connected with work (including an act of physical violence) and an employee, or a self employed person working on the company`s premises, suffers an over-seven-day injury an online accident report form (F2508) must be completed on the HSE website.

An over-seven-day injury is one which is not major but results in the injured person being away from work or unable to do the full range of his/her normal duties for more than seven days (including any days he/she wouldn`t normally be expected to work such as weekends, rest days or holidays) and not counting the day of the injury itself.

## **Reportable Dangerous Occurrences**

Dangerous occurrences are certain, specified near-miss events. Not all such events require reporting.

There are 27 categories of dangerous occurrences that are relevant to most workplaces, for example:

- collapse, overturning or failure of load-bearing parts of lifts and lifting equipment;

- plant or equipment coming into contact with overhead power lines;
- accidental release of any substance which could cause injury to any person.

Please see full list of dangerous occurrences in Schedule 2 of RIDDOR 2013.

## **Reportable Diseases**

If a doctor certifies that an employee is suffering from a reportable work-related disease a report form (F2508A) must be submitted on the HSE website.

These diseases include:

- carpal tunnel syndrome;
- severe cramp of the hand or forearm;
- occupational dermatitis;
- hand-arm vibration syndrome;
- occupational asthma;
- tendonitis or tenosynovitis of the hand or forearm;
- any occupational cancer;
- any disease attributed to an occupational exposure to a biological agent.

The full list of reportable diseases, and the work activities they are related to, can be found in the detailed guide to the Regulations.

## **HSE Incident Contact Centre Details**

- Telephone: 0845 300 9923 (Monday to Friday 8.30am to 5.00pm)
- Out of hours telephone contact numbers: 0151 922 1221 or 0151 922 1221
- Internet: [www.riddor.gov.uk](http://www.riddor.gov.uk) or [www.hse.gov.uk/riddor](http://www.hse.gov.uk/riddor)

### **The appointed person/s for reporting accidents/incidents under RIDDOR will be:**

Steve Quinn

### **The person/s within the Company responsible for implementing and monitoring the rules and procedures in this area and associated work activities will be:**

Steve Quinn

## **3.6 Fire Safety and Other Emergencies**

The company recognises that it has a responsibility to provide a safe and healthy working environment and acknowledges that this includes ensuring that procedures are developed and followed in respect of fire and other emergencies.

The company will endeavour to control the associated risks and to comply with the legal requirements relating to fire safety and other emergencies, as contained within the Regulatory Reform (Fire Safety Order) 2005 and the Management of Health and Safety at Work Regulations 1999, and with the specific guidance notes issued by the Health and Safety Executive and Fire Authority.

In particular the following rules and procedures will be applied in relation to this area and associated work activities:

The company will take such general fire precautions as will ensure, so far as is reasonably practicable, the safety of all employees and other persons that may be affected by its activities.

Risk assessments will be completed for all premises occupied by the Company for the purpose of identifying the general fire precautions required to be implemented.

The significant findings of the assessments and details of any groups of persons identified as being especially at risk will be recorded and brought to the attention of relevant employees and other affected persons.

All relevant risk assessments will be subject to periodic monitoring at a frequency prescribed by the assessment.

All relevant risk assessments will be subject to periodic review at a frequency prescribed by the assessment or when they are no longer valid or significant changes have occurred.

Where dangerous substances may be present in or on premises, the risk assessment will take account of any relevant special hazards with a view to eliminating or reducing the risks so far as is reasonably practicable.

All premises will be equipped with appropriate fire-fighting equipment and with fire detectors and alarms where considered to be necessary, as determined by the risk assessment.

All non-automatic fire-fighting equipment will be easily accessible, simple to use, and their location will be indicated by signs.

Suitable and sufficient emergency routes and exits will be designated for all company premises and selected in order for employees and any other persons to evacuate as quickly as possible.

All emergency routes and exits will lead to a place of safety and will be indicated by signs.

All emergency exits and the routes to emergency exits from premises must be kept clear at all times.

All emergency exit doors will open in the direction of escape and allow easy and immediate opening.

All emergency exit doors must remain unlocked and unfastened at all required times.

All emergency exits and routes requiring illumination will be provided with suitable emergency lighting.

All fire alarms will be maintained in efficient working order, good repair, serviced at required intervals and tested at regular intervals, as determined by the risk assessment. A suitable record of such tests will be kept and maintained.

Fire drills / emergency evacuations will take place at required intervals. A suitable record of such drills shall be kept and maintained.

All employees will be provided with suitable and sufficient instruction and training on the appropriate precautions and actions required to be taken by them in case of fire or other emergencies. This training will be provided at induction and repeated periodically and/or when required.

All visitors to company premises, including contractors, will be provided with suitable information and will be required to record their details in a register, including times of arrival and leaving.

The company will appoint one or more suitable `Competent Persons` for every premises, who will be responsible for ensuring that all preventative and protective measures for fire and other emergencies are in place. All such appointees will be provided with adequate information, training and other resources in order to carry out his/her role and duties effectively.

The company will appoint a sufficient number of fire marshals at every premises in order to implement

and manage the emergency evacuation procedures. Duties of fire marshals will be as detailed below.

The company will prepare and publish a Fire / Emergency Plan for all company premises as detailed below.

## **Fire / Emergency Plan**

Any person discovering a fire shall raise the alarm and then notify the fire marshal or appropriate manager / supervisor.

The fire marshal or manager / supervisor shall ensure that the relevant emergency services are phoned giving the following information:

- Name of person making call
- Site address
- Telephone number
- Nature of incident (if known)

The fire marshal shall remove the visitors book / staff register and vacate the premises by the nearest available exit.

All personnel should vacate the premises calmly and quickly by the nearest available emergency exit and assemble at their nominated point.

Once at the assembly point employees must report to the fire marshal who will conduct a roll call to establish complete evacuation or any missing persons.

## **Duties of Fire Marshals**

Appointed fire marshals will ensure that:

All fire exits and fire escapes are kept clear at all times.

Fire doors are unlocked during working hours or other periods of occupancy.

Fire-fighting equipment is sited correctly.

Fire-fighting equipment has been checked and serviced in accordance with requirements.

Fire-fighting equipment used or found to be defective is reported immediately.

An up-to-date list of personnel is maintained.

All personnel are made aware of the fire / emergency plan and the action required in the event of a fire or other emergency.

Fire drills are carried out at suitable intervals after obtaining authorisation from management.

Fire and emergency records are maintained.

## **Competent Persons for fire and other emergencies are:**

- Steve Quinn
- Dave Roberts
- Mark Towers

## **Appointed Fire Marshals are:**

- Dave Roberts
- Tom Hannigan
- Craig Cambell
- Andy Richmond
- Zac Holland

Rob Lyons  
Tristram Whitman  
Sue Quinn  
Nikki Purcell  
Matt McGuire

The person/s within the company responsible for implementing and monitoring the rules and procedures in this area and associated work activities will be:

Steve Quinn  
.....  
.....

### **3.7 Manual Handling**

The Company recognises that it has a responsibility to provide a safe and healthy working environment and acknowledges that this includes dealing with the risk of injuries and other problems associated with manual handling.

The main injuries associated with manual handling include:

- Musculoskeletal disorders (MSDs) eg back strain, slipped discs
- Hernias
- Lacerations, crushing of hands or fingers
- Repetitive strain injuries eg tenosynovitis
- Bruised or broken toes or feet
- Various sprains and strains.

The Company will endeavour to control the associated risks and to comply with the relevant legal requirements, as contained within the Manual Handling Operations Regulations 1992, and with the specific guidance note (L23) issued by the Health and Safety Executive.

In particular the following rules and procedures will be applied in relation to this area and associated work activities:

- (1) The Company will, wherever possible or feasible, avoid the need for potentially hazardous manual handling by providing mechanical means or other working systems.
- (2) Where it is not possible or feasible to avoid potentially hazardous manual handling suitable and sufficient risk assessments of the tasks involved will be carried out with a view to reducing the risk of injury by the implementation of control measures.
- (3) All manual handling assessments will be designed to look at all of the following areas:
  - The tasks involved
  - The individual capacities required
  - The loads involved
  - The working environment involved
- (4) Suitable records will be kept of all manual handling assessments, which will be brought to the attention of all relevant employees.
- (5) Suitable and sufficient instruction, training and supervision will be provided in the correct handling and lifting techniques to all employees involved in manual handling tasks.
- (6) Suitable and sufficient required personal protective equipment will be provided to all employees involved in manual handling.

(7) Employees will not be required to lift or move any loads that are beyond their individual capabilities.

(8) Employees will be encouraged to seek assistance when lifting or moving loads from other employees when required.

(9) The selection of persons to carry out manual handling or lifting tasks will be based on the training given, age, physique etc.

**The person/s within the Company responsible for implementing and monitoring the rules and procedures in this area and associated work activities will be:**

Steve Quinn

### **3.8 Workplace Transport**

The Company recognises that it has a responsibility to provide a safe and healthy working environment and acknowledges that this includes ensuring the safe operation of vehicles within the Companies premises or under the control of the Company.

The main problems associated with transport and vehicles include:

- Collisions with pedestrians
- Collisions between vehicles
- Reversing of vehicles
- People falling from vehicles
- Overloading of vehicles
- Overturning vehicles

The Company will endeavour to comply with the relevant legal requirements, as contained within the Management of Health and Safety at Work Regulations 1999 and the Workplace (Health, Safety and Welfare) Regulations 1992, and with the specific Approved Codes of Practice (L21 and L24) and guidance notes (HSG 136 and INDG 199) issued by the Health and Safety Executive.

In particular the following rules and procedures will be applied in relation to this area and associated work activities:

(1) All activities involving workplace transport and vehicle movement will be subject to risk assessment and subsequent action, as detailed within the Risk Management section of the policy.

(2) Workplace vehicle transport systems will be developed with the following aims and objectives:

- Ensuring that vehicles and pedestrians are kept safely apart
- Providing suitable pedestrian crossing points on vehicle routes
- Providing suitable vehicle parking
- Avoiding sharp or blind bends
- Ensuring that vehicle routes are sufficiently wide for all vehicles using them
- Ensuring firm and even floor surfaces on all routes
- Ensuring that floor and other signage is provided and maintained
- Considering the adoption and enforcement of speed limits
- Considering the need for barriers in high risk areas
- Considering the need for speed humps
- Considering the need for fixed mirrors at blind bends
- Ensuring that loading / unloading operations can be carried out safely
- Ensuring that reversing manoeuvres are kept to a minimum
- Considering the feasibility of one-way systems
- Ensuring good levels of lighting in all areas

- Provision of banksmen or other means of controlling any necessary reversing operations
- Carrying out regular safety checks of traffic routes using an appropriate checklist

(3) All company vehicles will be safe and suitable for their purpose including:

- Proper maintenance according to a pre-planned maintenance programme
- Provision of safety features (eg seat belts, horns, lights, reflectors, reversing lights and reversing alarms)
- Provision of guards on dangerous parts of vehicles
- Suitable driver protection from adverse weather and environmental conditions (eg noise, vibration, fumes)
- Protection from overturning or falling objects
- Daily driver safety checks using an appropriate checklist

(4) Every authorised driver must check his / her vehicle at the beginning and end of each shift to ensure that it is safe to use and shall report all defects as soon as possible to their manager.

(5) Only personnel authorised and qualified to the appropriate standards will be permitted to operate any vehicle owned or leased by the Company.

(6) Drivers will be subject to comprehensive selection and training procedures relevant to their particular vehicle including:

- Checks on previous experience and training
- Tests of competence
- Provision of required induction training
- Provision of regular refresher training

(7) Records will be kept of all driver training with copies of relevant licences, certificates or authorisations.

(8) All drivers shall report any accident / incident irrespective of any injury / damage to their manager / supervisor as soon as practicable.

(9) All lift truck drivers and other employees or other persons present around high risk traffic routes must wear high visibility vests or jackets.

(10) All drivers must ensure that all loads are safely secured before moving a vehicle.

(11) Any driver operating on public roads must comply with the Road Traffic Act and regulations.

(12) All delivery drivers must remain in the rest room, other safe area or cab during loading/unloading operations

**The person/s within the Company responsible for implementing and monitoring the rules and procedures in this area and associated work activities will be:**

Steve Quinn

### **3.9 Slips and Trips**

The Company recognises that it has a responsibility to provide a safe and healthy working environment and acknowledges that this includes controlling the risks of slips and trips accidents at work.

The Company will endeavour to comply with the relevant legal requirements, as contained within the Management of Health and Safety at Work Regulations 1999 and the Workplace (Health, Safety and Welfare) Regulations 1992, and with the specific Approved Codes of Practice (L21 and L24) and guidance notes (HSG 155) (INDG 225) issued by the Health and Safety Executive.

In particular the following rules and procedures will be applied in relation to this area and associated work activities:

- (1) All risk assessments must consider the hazards that could result in slips and trips and, where identified, measures must be taken to eliminate, reduce or control the risks involved.
- (2) The selection of floor surfaces must include consideration of the slip resistant qualities and general suitability to the areas in question and the activities or processes carried out.
- (3) Measures should be taken to prevent floors from getting wet or contaminated from work activities or processes. Keep water or contaminants away from walkways.
- (4) Spillage procedures must ensure the rapid clean up of any spillages or contamination by designated personnel without further endangering employees and other persons. Where floors are greasy a suitable cleaning agent must be used.
- (5) Where necessary suitable warning signs and barriers must be erected during the removal of spillages.
- (6) Steps and slopes on floors must have good foot and hand holds and have no sudden changes of level.
- (7) Adequate levels of lighting must be provided and maintained in all areas and walkways.
- (8) Where necessary suitable footwear will be provided for employees, taking into account the conditions, the work and the individual.
- (9) Trailing leads must be avoided in all working areas and walkways.
- (10) All accidents and incidents involving slips and trips must be recorded and investigated fully, with consideration being given to the underlying causes and required improvements to prevent a recurrence.
- (11) When carrying out risk assessments, account must be given to access to areas by members of the public and possible vulnerable groups (eg older people and disabled).
- (12) Suitable and adequate information, instruction and training must be provided to all employees regarding the avoidance of slips and trips accidents and in spillage removal and prevention.
- (13) Employees must report all spillages immediately to their manager / supervisor together with any building defects or other problems that are causing floors to be wet, slippery or uneven.
- (14) All maintenance work resulting in wet, slippery or uneven floors must be carried out as soon as possible, with barriers and warning signs being erected as a temporary measure.
- (15) All areas must be kept clear of rubbish and other obstructions likely to cause slips and trips.

**The person/s within the Company responsible for implementing and monitoring the rules and procedures in this area and associated work activities will be:**

Steve Quinn  
Vocational group managers  
Off-site safety coordinator  
Head office safety coordinator



## 3.10 Stress

The Company recognises that it has a responsibility to provide a safe and healthy working environment and acknowledges that this includes preventing employees from suffering from the adverse effects of stress caused by, or arising out of, workplace activities.

The Company will endeavour to comply with the relevant legal requirements, as contained within the Management of Health and Safety at Work Regulations 1999 and other applicable legislation, and with the specific Approved Code of Practice (L21) and guidance notes (HSG218) issued by the Health and Safety Executive.

In particular the following rules and procedures will be applied in relation to this area and associated work activities:

(1) The Company will undertake an assessment of the significant risks relating to work related stress faced by employees. The assessment will be based around the HSE developed 'Management Standards for Work-related Stress' as follows:

Demands – such as workload, work patterns and work environment

Control – how much say the person has in the way they do their work

Support - the level of encouragement and resources provided by the organisation, management and colleagues

Relationships – covering issues such as bullying and harassment

Role – whether individuals understand their role in the organisation and whether the organisation ensures that the person does not have conflicting roles

Change – how organisational change is managed and communicated in the organisation

(2) Management and employees at all levels will be encouraged to take work related stress seriously. It must not be accepted as “part of the job”.

(3) Management and employees will receive information, instruction and training to assist them in recognising situations which are adversely stressful or symptoms of stress in individuals.

(4) The Company will adopt suitable measures to minimise exposure to work related stress, including procedures for dealing with absence from work due to stress and when returning to work after a prolonged absence.

(5) The Company will implement and monitor a system for the reporting and investigation of any incidents of work related stress.

(6) The Company will ensure that all staff at risk from work related stress receive adequate training in the measures required to minimise the risk to themselves.

(7) If a member of staff or other relevant person is placed in an unduly stressful situation arising from their employment, the Company undertakes to implement any reasonably practicable measures to prevent recurrence and overcome the harmful effects of any work related stress.

(8) Where work related stress is as a direct result of harassment, intimidation, abuse or violence the Company will fully investigate the feasibility of taking legal and/or disciplinary proceedings against any perpetrators as appropriate.

(9) While this policy provides a framework for managing work related stress within the Company, circumstances may dictate that the response to a particular situation requires some modification of this procedure.

(10) Employees are required and encouraged to report to their manager / supervisor any incidents of work related stress regardless of the circumstances.

### Definition of Stress

Work related stress (WRS) is normally defined as “the adverse reaction people have to excessive pressures or other types of demands placed on them”.

This makes an important distinction between beneficial effects of reasonable pressure and challenge (which can be stimulating and motivating) and work-related stress, which is the natural but distressing reaction to demands or “pressures” that the person perceives they cannot cope with at a given time.

## **Possible Causes of Stress**

The Company recognises that there are certain situations, which increase the risks of work related stress. The following list is not exhaustive and risk assessments may identify others.

- (i) Over or under loaded work patterns
- (ii) Inadequate training to carry out tasks
- (iii) Environmental conditions creating difficult working conditions, e.g. high noise levels, poor ventilation, inappropriate humidity, temperature, lighting or hygiene
- (iv) Potentially violent situations and /or lone working.
- (v) Staff returning after long-term absence
- (vi) Lack of consultation with employees.
- (vii) Inadequate communication between management and employees
- (viii) Long working hours
- (ix) Repetitive un-stimulating work
- (x) Lack of control on how work is carried out
- (xi) Lack of management support in times of crisis
- (xii) Significant change within the organisation
- (xiii) New technologies
- (xiv) New ways of working
- (xv) Frequent minor changes within an organisation
- (xvi) Conflict between personnel
- (xvii) Ambiguity in job roles
- (xviii) Limited new staff induction or role change
- (xix) Lack of breaks and annual leave

## **Possible Control Measures for Stress**

Appropriate control measures to eliminate or manage significant risk may include:

- (i) Monitoring staff work patterns and making adjustments to ensure a reasonable work rate can be achieved.
- (ii) Checking training requirements during annual appraisals and encouraging staff to make known other training needs during the year.
- (iii) Monitoring environmental conditions e.g. thermometers, hydrometers etc to check environmental

conditions and providing humidifiers or similar as required.

(iv) Ensuring that all potential violent and lone working situations are assessed.

(v) Requiring that all staff returning after absence are interviewed by personnel and/or their own section. During which time their job may be assessed for special return to work conditions e.g. part time working/reduced hours etc.

(vi) Consultation with staff whenever working conditions are changed by face-to-face verbal meetings as well as paper documentation.

(vii) Regular and frequent staff meetings between staff and management and an open door policy to discuss problems.

(viii) Reassessment of jobs where excessive hours are worked on a frequent basis.

(ix) Effective communications between staff and management together with consultation on how work should be carried out.

(x) Management to be aware of staffing issues and how in times of crisis communications may become a problem and ensure that this does not happen.

(xi) Recognition that change can be viewed as both a positive as well as a negative aspect and ensuring that staff are informed of all changes and how it will affect them personally.

(xii) Ensuring that adequate training is always provided when new technologies are used, discussing with staff which types of technologies are being investigated and seeking advice from staff in other organisations currently using the technology regarding problems they have experienced.

(xiii) Ensuring that new working patterns need to take account of the work force who are going to work them, including ensuring that the hours can be physically worked e.g. working parent with small children/school runs etc.

(xiv) Recognising that frequent change can be as stressful as major change, ensuring that, wherever possible, staff are made aware of what is going to happen before it happens and keeping them informed on why changes are taking place.

(xv) When dealing with staffing conflicts ensuring that staff feel appreciated and that workloads are not creating the conflicts. If the problems are between management and staff considering the possibility of offering the employees a different line manager and move them to a similar post.

(xvi) Ensuring that any ambiguity in job role is quickly dealt with and amending job descriptions accordingly.

(xvii) Induction of all new staff into the company/organisation or department.

(xviii) Encouraging staff to take regular breaks. Supervisors and line managers to monitor those not taking their lunch break and annual leave on a regular basis and inquiring for the reasons for this.

## **Responsibilities of Managers and Supervisors**

Managers and Supervisors shall ensure that before any employee, contractor or other person, is instructed to perform any task which exposes them to the risk of work related stress:

(i) The risk to which the person may be exposed is assessed.

(ii) The essential measures required to manage any significant risks identified are implemented (including agreed systems of communication for obtaining rapid appropriate assistance).

(iii) Anyone identified as being at risk is given adequate information and training on how to recognise the signs of work related stress and how to avoid or walk away from situations which may be difficult for them to handle.

(iv) That a written record of the risks identified together with the control measures taken is maintained.

(v) All incidents of work related stress are reported and adequately investigated or acted upon.

**The person/s within the Company responsible for implementing and monitoring the rules and procedures in this area and associated work activities will be:**

Steve Quinn  
All other tiers of management

### **3.11 Electrical Safety**

The Company recognises that it has a responsibility to provide a safe and healthy working environment and acknowledges that this includes ensuring the provision, use and maintenance of safe electrical installations and equipment.

The main hazards associated with electricity include:

- Shock
- Burns
- Arcing
- Fires
- Explosions
- Secondary injuries (eg falls from height following shock)

The Company will endeavour to control the associated risks and to comply with the relevant legal requirements, as contained within the Electricity at Work Regulations 1989 and with the specific guidance (HSG 85/107/236 and HSR 25) issued by the Health and Safety Executive.

In particular the following rules and procedures will be applied in relation to this area and associated work activities:

#### **Fixed Electrical Installations**

- (1) All fixed installations and systems will meet the required standard (eg BS 7671).
- (2) All fixed installations will be maintained in a safe condition.
- (3) All fixed installations will be routinely inspected.
- (4) Adequate socket-outlets will be provided to avoid overloading or the excessive use of extension leads.
- (5) Employees are required to report any defective electrical installations or systems.

#### **Portable Electrical Equipment**

- (1) All portable electrical equipment will be safe and suitable for the particular work in which it is used.
- (2) All portable electrical equipment will be maintained in a safe condition.
- (3) All portable electrical equipment will be subject to a system of visual inspection and testing.
- (4) All portable electrical equipment brought on to Company premises or sites by employees (eg heaters, fans etc.) and contractors must be tested before use.
- (5) Employees are required to report any defective equipment and to remove from service if considered to be detrimental to safe usage.

## **Information and Training**

- (1) Adequate training and information will be provided to all employees regarding the safe use of electrical equipment.
- (2) All employees will be provided with copies of risk assessments and safe working procedures that are relevant to electrical installations, systems and equipment in their area or work activities.
- (3) The Company will only permit suitably competent persons to carry out any work on electrical installations, systems and equipment.
- (4) All contractors will be informed of, and comply with, the Company's Health and Safety policy and any relevant risk assessments or safe working procedures.

## **Record Keeping**

The following records will be retained and updated as appropriate:

- (1) A register of all portable electrical equipment on the Company premises or site.
- (2) Details of instruments and testing equipment used for electrical work.
- (3) Copies of any permits authorising work on electrical equipment.
- (4) Safety information provided to and by contractors.
- (5) All information relating to individual competence and training of persons who are authorised to inspect electrical installations or equipment or conduct, manage, supervise or assess electrical work.
- (6) Details of inspections and tests conducted on fixed installations, portable electrical equipment and personal protective equipment. These records must show the date of the test, the name of the tester, the scheduled date of the next test and details of any repairs or modifications carried out.

## **The person/s within the Company responsible for implementing and monitoring the rules and procedures in this area and associated work activities will be:**

Steve Quinn  
Vocational group managers  
Off-site safety coordinator  
Head office safety coordinator

## **3.12 Display Screen Equipment**

The Company recognises that it has a responsibility to provide a safe and healthy working environment and acknowledges that this includes ensuring the safe use of display screen equipment (DSE).

The main health problems associated with the use of display screen equipment include:

- Aches and pains in the hands, wrists, arms, neck, shoulders or back
- Eyestrain or similar visual problems
- Headaches
- Stress and fatigue
- Skin irritation or rashes

The Company will endeavour to control the associated risks and to comply with the relevant legal requirements, as contained within the Display Screen Equipment Regulations 1992 (DSE 92), and with the specific guidance (L26) issued by the Health and Safety Executive.

In particular the following rules and procedures will be applied in relation to this area and associated work activities:

- (1) The Company will carry out an analysis of every work station in order to assess and reduce the risks involved.
- (2) Assessments will take place on the introduction of new DSE or on the movement or change of location of DSE.
- (3) Assessments may be carried out by the individual user using the appropriate self assessment format in conjunction with adequate information, instruction and training.
- (4) Assessments will be reviewed on a regular basis and appropriate records will be kept.
- (5) Matters to be taken into account during the assessment will include:
  - The whole workstation including equipment, furniture and the working environment
  - The job or tasks involved
  - Any special needs of individual employees
- (6) Where the assessments reveal equipment or other issues that do not meet the minimum legal requirements, appropriate action will be taken to rectify such matters.
- (7) The Company will arrange for, and/or pay the reasonable costs of, eye and eyesight tests by a qualified optician for all DSE users.
- (8) All DSE users will be entitled for tests to be repeated at intervals as recommended by the optician.
- (9) The Company will pay the reasonable costs of providing users with spectacles required for DSE use, where found to be necessary by the tests.
- (10) All DSE users will be provided with suitable and sufficient information, instruction and training regarding the safe use of workstations and the availability of eye and eyesight tests.
- (11) Job rotation/breaks will be arranged if required in consultation with the appropriate manager / supervisor.

**The person/s within the Company responsible for implementing and monitoring the rules and procedures in this area and associated work activities will be:**

Steve Quinn  
Head office safety coordinator

### **3.13 Hazardous Substances**

The Company recognises that it has a responsibility to provide a safe and healthy working environment and acknowledges that this includes ensuring that all significant risks associated with the use, storage, sale or transport of hazardous substances are assessed and adequately controlled.

Hazardous substances could include:

- Substances used directly during work activities (eg adhesives, paints, cleaning agents)
- Substances generated during work activities (eg fumes, vapours, gases)
- Naturally occurring substances (eg grain dust)
- Biological agents (eg bacteria and other micro-organisms)

The health effects of exposure to chemicals and other hazardous substances could include:

- Skin irritation or dermatitis
- Asthma or other allergic responses

- Loss of consciousness
- Bacterial infections
- Cancer

The Company will endeavour to comply with the relevant legal requirements, as contained within the Control of Substances Hazardous to Health Regulations 2002 (COSHH) and the Chemicals (Hazard Information and Packaging for Supply) Regulations 2009 (CHIP), and with the associated specific Approved Codes of Practice (HSG 193) and guidance notes issued by the Health and Safety Executive.

In particular the following rules and procedures will be applied in relation to this area and associated work activities:

- (1) An up-to-date register of all chemicals and other hazardous substances used, stored, sold or transported by the Company will be maintained together with the latest relevant manufacturer's safety data sheets.
- (2) All new products will initially undergo a process of approval, using the relevant technical information and data sheets, before inclusion in the approved product range.
- (3) COSHH assessments will be completed and recorded for all chemicals and other hazardous substances used, stored, sold or transported by the Company.
- (4) All processes and activities will be designed and operated to minimise the emission, release and spread of substances hazardous to health.
- (5) When developing control measures account will be taken of all relevant routes of exposure (eg inhalation, skin absorption or ingestion).
- (6) Exposure will be controlled by measures that are proportionate to the particular health risks involved.
- (7) The most effective and reliable control options will be chosen which minimise the escape and spread of substances hazardous to health.
- (8) Where adequate control of exposure cannot be achieved by other means, suitable personal protective equipment will be provided, in combination with other control measures.
- (9) All elements of control measures will be monitored and reviewed regularly for their continuing effectiveness.
- (10) All employees will be provided with suitable and adequate information, instruction and training on the hazards and risks from the substances with which they work and the use of control measures developed to minimise the risks, including the use of required personal protective equipment.
- (11) When developing and introducing control measures care will be taken to ensure that it does not increase the overall risk to health and safety.
- (12) Suitable health surveillance will be arranged for any employee who may be exposed to any substance for which there is a disease associated with that substance (eg asthma, dermatitis or cancers) and where it is possible to detect the disease or any adverse health effect, and therefore reduce the risk of further harm.

## **General Precautions**

The following general precautions apply to the use, handling and transporting of chemicals and other hazardous substances:

- Products must never be allowed to come into contact with the eyes, skin or mucous membrane.
- Personal protective equipment and clothing must be worn, if required.
- Always observe good industrial hygiene practices.
- Do not swallow materials or use in areas where food is being consumed.
- Inhalation of chemical vapours or dust should be avoided.
- Adequate ventilation must be provided.

- Suitable respiratory protection must be worn, if required.
- Facilities for the washing and cleansing of the skin must be made available with the necessary cleaners and barrier creams.
- Store all products in ventilated areas away from extremes of temperatures and environment.
- Clean up spillages instantly and dispose of waste using suitable containers.
- Except for transport in closed packages, materials must only be handled by authorised personnel.
- Ensure the correct equipment for handling the products is made available.
- Any person using or handling chemicals and other hazardous substances who shows symptoms which may possibly have been caused by exposure to the product should immediately be removed from the area and medical advice sought. Reference should always be made to the relevant COSHH assessment and hazard data sheet.

**The person/s within the Company responsible for implementing and monitoring the rules and procedures in this area and associated work activities will be:**

Steve Quinn  
 Vocational group managers  
 Off-site safety coordinator  
 Head office safety coordinator  
 R.E.A.L. Independent Schools Headteacher

### **3.14 Personal Protective Equipment**

The Company recognises that it has a responsibility to provide a safe and healthy working environment and acknowledges that this includes the provision, use and maintenance of personal protective equipment (PPE).

The Company will endeavour to provide and maintain such personal protective equipment as required or deemed necessary and to comply with the relevant legal requirements, as contained within the Personal Protective Equipment at Work Regulations 1992, and with the specific guidance (L25), issued by the Health and Safety Executive.

In particular the following rules and procedures will be applied in relation to this area and associated work activities:

- (1) The Company acknowledges that, as a means of hazard elimination, the use of PPE is the last consideration.
- (2) Where it has been established that PPE is the only means, or is required to supplement other control measures, the Company will ensure that adequate supplies of suitable PPE are available and maintained.
- (3) Each department will maintain a list of all tasks requiring PPE and specify the standard of the PPE required.
- (4) Registers of PPE will be kept, including details of any inspection, maintenance or replacement requirements and relevant records.
- (5) Where appropriate, all PPE will conform to the applicable British Standard, and/or the relevant 'Certificates of Approval' issued by the Health and Safety Executive, or will be required to have the appropriate CE marking.
- (6) Where required, suitable and sufficient storage accommodation will be provided for PPE when not in use.
- (7) All employees required to wear PPE will receive suitable and adequate information, instruction and training in its use, maintenance, cleaning and storage, and the relevant risks it will avoid or limit.
- (8) All employees required to wear PPE must use it in accordance with the training and instructions provided.
- (9) All employees must report any defects to PPE or loss to their manager / supervisor.

**The person/s within the Company responsible for implementing and monitoring the rules**



## **and procedures in this area and associated work activities will be:**

Steve Quinn  
Vocational group managers  
Off-site safety coordinator

### **3.15 Machinery, Plant and Equipment**

The Company recognises that it has a responsibility to provide a safe and healthy working environment and acknowledges that this includes ensuring that all machinery, plant and equipment is maintained in a safe condition and used in a safe manner.

The main hazards associated with machinery, plant and equipment include:

- Entanglement
- Trapping (eg shearing, drawing in, and crushing)
- Impact
- Contact (eg friction, abrasion, cutting, stabbing, puncture and burns)
- Ejected materials or particles
- Dust and fumes
- Ergonomic issues
- Electricity
- Fire
- Noise
- Vibration

The Company will endeavour to control the associated risks and to comply with the relevant legal requirements, as contained within the Provision and Use of Work Equipment Regulations 1998 (PUWER 98) and the Supply of Machinery (Safety) Regulations 2008, and with the specific guidance (L22) issued by the Health and Safety Executive.

In particular the following rules and procedures will be applied in relation to this area and associated work activities:

- (1) The Company will, as far as is reasonably practicable, ensure that all equipment is suitable for the intended use or tasks.
- (2) All equipment will comply with the relevant British Standard and is CE marked, where appropriate.
- (3) All dangerous parts of machinery will be suitably and adequately guarded.
- (4) All equipment will be maintained in efficient order and in good repair.
- (5) Regular inspections of all equipment will be carried out by competent persons and suitable records kept, including prior to it being put into service. The frequency of inspections will be determined by the risk assessment or in line with legal requirements, manufacturers' instructions or other recommended guidance.
- (6) All equipment will be maintained in efficient order and in good repair.
- (7) Any defective equipment where there is an increased risk of injury will be taken out of operation and not used until the necessary repairs have been completed to render it safe to use.
- (8) Employees are required to report any defective equipment immediately to the appropriate manager / supervisor.
- (9) Employees are required to only use equipment for the purpose or operations for which it is suitable or intended.

(10) Every employee who uses equipment will receive suitable and adequate information, instruction, training and supervision.

**The person/s within the Company responsible for implementing and monitoring the rules and procedures in this area and associated work activities will be:**

Steve Quinn  
Vocational group managers  
Off-site safety coordinator

### **3.16 Noise at Work**

The Company recognises that it has a responsibility to provide a safe and healthy working environment and acknowledges that this includes preventing damage to the hearing of persons exposed to high levels of noise at work.

The main problems associated with occupational noise include:

- Noise induced hearing loss
- Temporary and permanent threshold shift
- Tinnitus
- Stress
- Injuries arising from distracted attention

The Company will endeavour to control the associated risks and to comply with the relevant legal requirements, as contained within the Noise at Work Regulations 2005, and with the specific guidance note (L108) issued by the Health and Safety Executive.

In particular the following rules and procedures will be applied in relation to this area and associated work activities:

(1) The Company will generally attempt to reduce exposure to noise at work and the consequential risk of hearing damage as far as is reasonably practicable by means other than ear defenders.

(2) If a noise problem is suspected, a suitable and sufficient noise assessment will be carried out by a suitably competent person to determine the appropriate level, type and duration of noise exposure and the corresponding course of action. Suitable records of all such assessments will be kept and reviews carried out at appropriate intervals.

(3) Measures taken in respect of noise exposure will be dependent upon the outcomes of the assessment and in accordance with comparisons against the legal action levels as follows:

- Lower Exposure Action Values - daily or weekly personal noise exposure of 80dB(A) or a peak sound exposure of 135dB(C) or 112 pascals.
- Upper Exposure Action Values - daily or weekly personal noise exposure of 85dB(A) or a peak sound pressure of 137dB(C) or 140 pascals.
- Exposure Limit Value - daily or weekly personal noise exposure of 87dB(A) or a peak sound pressure of 140dB(C) or 200 pascals, after taking into account the protection given by any personal hearing protectors provided.

(4) Where the noise exposure to employees is at or above a lower exposure action value but below an upper exposure action value, suitable personal hearing protectors will be made available to relevant employees upon request.

(5) Where the noise exposure is at or above an upper exposure action value `Hearing Protection Zones` will be demarcated and suitable signs displayed.

- (6) Suitable personal hearing protectors must be provided and must be worn by all persons who enter a hearing protection zone.
- (7) Adequate information, instruction and training will be provided to all employees with a noise exposure at or above a lower exposure action value regarding the risks to their hearing; availability of personal hearing protectors; defects reporting systems; their own duties and health surveillance issues.
- (8) All personal hearing protectors and other equipment will be maintained and repaired as necessary.
- (9) All employees will be required to use personal hearing protectors and other noise reduction equipment, where deemed necessary, and to report any defects to the appropriate manager/supervisor.
- (10) Where a noise risk assessment reveals that there is a risk to the health of employees who are exposed to noise, suitable health surveillance will be provided to the employees in question.
- (11) Health surveillance will normally take the form of regular hearing tests (audiometric testing) and will generally apply to all employees who are regularly exposed to noise at or above an upper exposure action value.
- (12) Where as a result of health surveillance an employee is found to have identifiable hearing damage arrangements will be made for the employee to be examined by a doctor or other suitably qualified medical specialist.
- (13) Where a doctor or other suitably qualified medical specialist considers that the hearing damage suffered by an employee is likely to be the result of exposure to workplace noise, the employee will be informed accordingly and other measures will be considered, including the review of relevant risk assessments and the health of other employees similarly exposed, together with consideration being given to assigning the employee to alternative work where there is no risk of further noise exposure.
- (14) Where persons other than employees are exposed to noise, similar measures will be taken to the above in respect to ensuring their protection from adverse noise levels other than the provision of health surveillance and general information, instruction and training.

**The person/s within the Company responsible for implementing and monitoring the rules and procedures in this area and associated work activities will be:**

Steve Quinn  
Vocational group managers  
Off-site safety coordinators

### **3.17 Abrasive Wheels**

The Company recognises that it has a responsibility to provide a safe and healthy working environment and acknowledges that this includes dealing with the specific risks associated with the use of abrasive wheels.

The main hazards associated with abrasive wheels include:

- Breakage or bursting of the wheel
- Injuries arising from flying particles
- Contact with running wheels
- Cuts to hands, legs etc
- Dusts emitted from materials
- Loose clothing becoming entangled
- Electric shock
- Noise
- Vibration
- Fire and explosion

The Company will endeavour to control the associated risks and to comply with the relevant legal requirements, as contained within the Provision and Use of Work Equipment Regulations 1998 (PUWER 98), and with the specific guidance(HSG 17) issued by the Health and Safety Executive .

In particular the following rules and procedures will be applied in relation to this area and associated work activities:

- (1) Any person who is required to inspect, examine. test, mount, change, balance, dress, adjust or mark abrasive wheels will be suitably trained in the tasks.
- (2) Any person required to use an abrasive wheel and associated machinery will be suitably trained in the task or adequately supervised by a trained person.
- (3) A record will be kept of all persons trained in the safe mounting of abrasive wheels.
- (4) All reasonable measures will be taken to ensure that all abrasive wheels and associated machinery are suitable for their intended use and maintained in a safe condition.
- (5) All abrasive wheels and associated machinery will be subjected to regular inspection and if found to have any defect that could give rise to injury will be taken out of use immediately.
- (6) All abrasive wheels will be stored and transported in a safe and careful manner.
- (7) All abrasive wheels will be suitably marked with their type, size and maximum operating speed.
- (8) All persons who carry out any work activities involving abrasive wheels will be provided with, and be required to wear suitable personal protective equipment, including eye protection.

**The person/s within the Company responsible for implementing and monitoring the rules and procedures in this area and associated work activities will be:**

Steve Quinn  
Vocational group managers  
Off-site safety coordinator

### **3.18 Legionella**

The Company recognises that it has a responsibility to provide a safe and healthy working environment and acknowledges that this includes controlling the health risks associated with legionella bacteria in water systems.

The presence of legionella bacteria in water systems can, under certain circumstances, result in the potentially fatal legionnaires disease in employees and other persons who breath in the contaminated water droplets.

The Company will endeavour to comply with the relevant legal requirements, as contained within the Management of Health and Safety at Work Regulations 1999 and the Notification of Cooling Towers and Evaporative Condensers Regulations 1992, and with the specific Approved Codes of Practice (L8)(L21) and guidance notes issued by the Health and Safety Executive.

In particular the following rules and procedures will be applied in relation to this area and associated work activities:

- (1) The Company will carry out a risk assessment in respect of the risk of legionella within the water systems within company premises, including an assessments of the water temperatures involved; the possibility of droplet formation and the presence of any particularly susceptible persons.
- (2) An up to date schematic plan of the water systems will be prepared.

- (3) The risk assessment and schematic plan will contain details of the precautions to be taken and instructions for the operation of the system.
- (4) Where necessary, a written cleaning and disinfection/treatment procedure for the water systems will be developed.
- (5) Regular visual checks will be carried out on the cleanliness and general condition of the water system.
- (6) Where necessary, water temperature, chemical water quality and legionella checks will be carried out.
- (7) Records of all tests undertaken and maintenance to the water systems will be kept.
- (8) Where there are water cooling towers or evaporative condensers situated on company premises the relevant local authority will be notified.

**The person/s within the Company responsible for implementing and monitoring the rules and procedures in this area and associated work activities will be:**

Steve Quinn  
Off-site safety coordinator

### **3.19 Information, Instruction and Training**

The Company recognises that it has a responsibility to provide a safe and healthy working environment and acknowledges that this includes ensuring a competent workforce through the provision of suitable and adequate information, instruction and training.

The Company will endeavour to comply with the relevant legal requirements, as contained within the Management of Health and Safety at Work Regulations 1999 and other applicable legislation, and with the specific Approved Code of Practice (L21) and guidance notes issued by the Health and Safety Executive.

In particular the following rules and procedures will be applied in relation to this area and associated work activities:

- (1) The Company will not require any employee to perform any work activity or task unless he/she has received suitable and adequate information, instruction and training, or is working under the supervision of a trained and competent employee.
- (2) The Company acknowledges the importance of providing information, instruction and training to all new staff as soon as is practicable after commencement of employment.
- (3) The Company recognises that instruction and training may also be necessary for existing employees to act as a reminder and to accommodate any changes in their work practices or environment.
- (4) The Company accepts the responsibility of ensuring that all temporary employees are also given basic health and safety information, instruction and training appropriate to their work activities and environment.
- (5) The training needs for all employees (or groups of employees) and their related work activities will be evaluated and the results of the evaluation will form the basis of a training matrix.
- (6) Training needs assessments will be reviewed periodically and the training matrix updated as required.
- (7) Records will be kept of all training provided to employees and any relevant outcomes.

### **TRAINING ARRANGEMENTS**

In order to safeguard the health and safety of employees, so far as is reasonably practicable, the following

general provisions for training have been recognised:

## **Induction Training**

Health and safety induction training for new employees will take place on the first day of employment, but where this is not possible it will commence as soon as practicable after joining.

It will include:

- Presentation of the Company health and safety policy and how it affects employees
- Accident reporting procedures
- Fire prevention and emergency evacuation procedures
- General safety rules and procedures
- First aid facilities
- Specific safety systems and procedures
- Identification of particular hazards which exist at the workplace
- Health and safety legislation appropriate to the organisation and the employee's obligations
- How to obtain advice or report any concerns regarding health and safety practices
- Identity of responsible person(s), first-aiders, fire warden etc.
- Welfare provisions.

## **New Managers and Supervisors**

New employees of a managerial or supervisory level will receive training regarding their responsibilities, including:

- The relevant procedures and policies which require implementation
- Sources that are available to them if they require specialist assistance or if they need to obtain further or professional advice
- Procedures are in place for addressing any problems which may arise.

## **Job Specific Training**

Detailed and specific departmental health and safety training will be provided to all new employees to supplement their general induction training and will include:

- The relevant work activities / processes
- The work environment
- The work equipment
- Any particular risk(s) associated with their department work activity and/or processes.

## **Function Specific Training**

It is recognised there are certain functions or responsibilities carried out by some employees that require specific training. These include:

- First aiders
- Appointed persons for first aid
- Fire wardens

## **Existing Employees**

Further training will be provided, if necessary, to existing employees if:

- They transfer to a different department

- They take on new responsibilities
- They are exposed to new or increased risks
- There is a significant change in the work equipment, environment or systems of work in use.

## **Temporary Employees**

Temporary employees will be provided with general health and safety instructions (eg emergency procedures, site safety rules etc.) in addition to any specific instruction relevant to the department or work activities.

## **Approved Training Courses and Providers**

The Company will develop a list of approved training courses and providers including the following courses:

- IOSH Managing Safely
- IOSH Practical Safety Awareness
- IOSH Working Safely
- NEBOSH General Certificate
- Manual Handling
- COSHH Awareness
- Risk Assessment Awareness
- Basic First Aid
- Fire Safety Awareness

## **Contractors**

Steps will be taken when selecting contractors to ensure that they have a programme of training and that all relevant employees have received suitable and adequate information, instruction and training.

## **The person/s within the Company responsible for implementing and monitoring the rules and procedures in this area and associated work activities will be:**

Steve Quinn

## **3.20 Consultation**

The Company recognises that it has a responsibility to provide a safe and healthy working environment and acknowledges that this policy cannot be achieved without the co-operation and commitment of employees at all levels, requiring the development and maintenance of effective means of consultation.

The Company will endeavour to promote consultation and to comply with the relevant legal requirements, as contained within the Safety Representatives and Safety Committees Regulations 1977 and the Health and Safety (Consultation with Employees) Regulations 1996 and with the associated guidance issued by the Health and Safety Executive.

Regular consultation and discussions with employees on health and safety matters is therefore given high priority in order to gain their continued support and co-operation.

In particular the following rules and procedures will be applied in relation to this area:

- (1) All employees at all levels within the Company are encouraged to participate in safety meetings led by their manager / supervisor.
- (2) Employees and/or their representatives are encouraged to raise concerns about health, safety and welfare

matters with their manager / supervisor and will receive positive feedback on any issues raised. Any unresolved issues can be raised at the next safety meeting and / or with the Safety Co-ordinator.

(3) Suitable and adequate training and other information or resources will be provided for all safety representatives in order to allow them to take a full and effective part in consultations.

(4) Employees and/or their representatives will be consulted on all matters that affect their health, safety and welfare, including relevant changes in procedures, equipment and working methods or the introduction of new technology. The feedback arising from such consultation will be considered before any decisions are made.

(5) Employees and/or their representatives will be kept informed of risks associated with work activities and the measures required to be taken to control those risks, including copies of relevant risk assessments and safe systems of work or working procedures.

(6) The Company will form a Health and Safety Committee with the following terms of reference and constitution:

### **Health and Safety Committee**

The membership of the Health and Safety Committee will be subject to the agreement of the management and the respective employee representatives.

However, the committee shall include a senior managerial representative nominated by the director responsible for health and safety in order to ensure that there is adequate authority present to make decisions and with knowledge and expertise to provide accurate information to the committee on such matters as company policy, technical matters etc.

The meetings will be held on a quarterly basis, unless the Committee decides it would be beneficial to change this frequency to a more regular basis.

Each member of the Committee will receive a copy of the minutes and a copy will be placed on all health and safety notice boards or brought to the attention of all employees using other alternative means of communication.

The terms of reference of the Committee will include:

- The review of any accident reports
- Examination of safety audit and inspection reports
- Consideration of reports by safety representatives
- Consideration of reports by enforcement officers
- Development and monitoring of safety rules and safe working procedures
- Monitoring of the adequacy of health and safety communication systems.

**The person/s within the Company responsible for implementing and monitoring the rules and procedures in this area and associated work activities will be:**

Steve Quinn

### **3.21 Environmental and Waste Management**

The Company recognises that it has a responsibility to provide a safe and healthy working environment and acknowledges that this includes ensuring that its activities do not have an adverse effect on the local and general environment.

The Company will endeavour to control such adverse effects on the environment and to comply with the legal



requirements and duty of care imposed by the Environmental Protection Act 1990.

In particular the following rules and procedures will be applied in relation to this area:

- (1) The Company will control and reduce the amount of packaging used within its business activities.
- (2) The Company will implement measures to minimise the amount of waste materials arising from its business activities.
- (3) The Company will implement measures to minimise the amount of paper and similar products used within its business activities.
- (4) The Company will control emissions to the atmosphere to the levels set by legal requirements.
- (5) The Company will control liquid discharge to within limits set by the Environment Agency.
- (6) The Company will implement measures to prevent the escape of waste from its business activities.
- (7) The Company will ensure that waste is only transferred to an authorised contractor and provide a written description of the waste, maintaining records for the minimum prescribed period of two years.
- (8) The Company will ensure that all appointed waste contractors are authorised in respect of the different categories of waste as follows:

General:

Certificate No:

Expiry Date:

Chemicals: Printer toner

Certificate No: 1

Expiry Date: Ongoing

**The person/s within the Company responsible for implementing and monitoring the rules and procedures in this area and associated work activities will be:**

Steve Quinn

### **3.22 Driver Safety and Security**

The Company recognises that it has a responsibility to provide a safe and healthy working environment and acknowledges that this includes ensuring that the risks and other problems associated with the driving of vehicles operating on company business is adequately controlled.

The hazards and problems associated with driving include:

- Fatigue due to excessive driving hours
- Distractions during driving
- Driving without care or attention
- Driving without a valid licence or insurance
- Driving when disqualified or under the influence of alcohol or drugs
- Exceeding speed limits due to unreasonable demands
- Loading and unloading of vehicles
- Failing to report accidents or offences
- Driving in adverse weather conditions
- Unsafe conditions of vehicles
- Overloading or unsafe loading of vehicles
- Theft from vehicles and associated violence

The Company will endeavour to comply with the relevant legal requirements, as contained within the Management of Health and Safety at Work Regulations 1999, and with the specific Approved Code of Practice (L21) and guidance notes issued by the Health and Safety Executive and other relevant bodies.

In particular the following rules and procedures will be applied in relation to this area of work activity:

- (1) Only authorised personnel are allowed to drive company vehicles.
- (2) Company vehicles will only be available to employees who hold a current and valid driving licence.
- (3) Any conviction for driving offences, driving licence endorsements and any fines incurred by employees who drive on company business must be reported immediately.
- (4) Any employee who is considered to be acting carelessly or recklessly in the use of vehicles driven on company business will be subject to disciplinary action.
- (5) Any accident or incident involving a vehicle driven during the course of company business must be reported immediately, regardless of fault.
- (6) Where the holding of a licence is an essential requirement of a job, an employee being prosecuted or convicted of a driving offence which results in disqualification for any period, this should result in the employee's dismissal.
- (7) Company drivers must avoid the consumption of alcohol or drugs prior to or during the course of driving, infringement of which could result in the employee's dismissal.
- (8) Unauthorised passengers must not be carried in vehicles during the course of company business.
- (9) Company vehicles must not be used for personal gain or pleasure without permission.
- (10) All vehicles must be serviced in accordance with the company policy and/or manufacturer's recommendations.
- (11) Employees must generally ensure that their vehicle is kept in good condition. This includes keeping it clean and ensuring that the tyre pressures, lights, oil, water etc meet the required standard.
- (12) No vehicle must be driven in an unroadworthy condition. Any defects to company vehicles must be reported immediately.
- (13) All loads on vehicles must be properly secured at all times.
- (14) Drivers must report in by telephone regularly or as otherwise required. Where it is not possible to complete the required assignments for any reason, the appropriate manager / supervisor must be contacted and kept fully informed of the situation.
- (15) Statutory regulations and company rules regarding the recording of mileage, journeys undertaken and accrued driving hours etc must be complied with at all times.
- (16) Drivers must not use mobile phones during the course of driving unless suitable hands-free devices are fitted to the vehicle or otherwise available for use.
- (17) Drivers must not eat or drink during the course of driving.
- (18) To ensure compliance with insurance requirements vehicles must always be locked when not in use.
- (19) When driving through built up areas windows must be kept shut and doors locked if possible. All valuables including laptops and briefcases must be located in the boot of the car at all times.
- (20) Valuables must not be left in the vehicles when a vehicle is left overnight .
- (21) Any company driver doing a long journey must plan the trip to ensure the tiredness factor has been considered. If during a trip it is evident that to continue driving would constitute a risk, making a temporary stop or booking overnight accommodation should be considered.

(22) Any employee using a company vehicle or driving on company business must take with them a mobile phone to ensure emergency help can be obtained.

(23) Any employee who witnesses theft of, or from, a vehicle must not put them self at risk of violence by attempting to prevent the theft or other similar action.

(24) All drivers must be aware of a pupils pen picture and risk assessment. Accordingly an evaluation of potential risk should always be made ahead of travel in staff cars. Precautions should be taken and permission should be signed by parents/carers. Drivers should be aware of potential distractions caused by misbehaviour or illness.

(25) If the learner becomes violent, staff must pull over when safe to do so and call the learning manager for support. If the learning manager is not available contact the office. The same procedure must also take place if the learner takes off their seatbelt. Risk assessment and pen picture must be updated and all staff informed.

(26) Always have a key set of rules for use of radio, opening windows, seat belts and general conduct.

**The person/s within the Company responsible for implementing and monitoring the rules and procedures in this area and associated work activities will be:**

Steve Quinn  
All management

### **3.23 Mobile Phones**

The Company recognises that it has a responsibility to provide a safe and healthy working environment and acknowledges that this includes implementing measures to ensure that health and safety is not compromised by the use of mobile phones, particularly while driving.

The Company will endeavour to comply with the relevant legal requirements, as contained the Management of Health and Safety at Work Regulations 1999, and with the specific guidance issued by the Health and Safety Executive and other relevant bodies.

In particular the following rules and procedures will be applied in relation to this area or work activity:

(1) Although the scientific evidence is unclear regarding the adverse effects on the health of mobile phone users caused by the emission of radio frequency radiation the Company suggests that employees limit the time spent by them using mobile phones.

(2) Wherever possible employees should make every effort to use land-line phones rather than mobile phones.

(3) Company employees should, as far as possible, avoid the use of mobile phones when driving in order to avoid the disturbance of their concentration.

(4) Company employees must never use their mobile phones when driving unless using an approved hands-free device.

**The person/s within the Company responsible for implementing and monitoring the rules and procedures in this area and associated work activities will be:**

Steve Quinn  
All managers

### **3.24 Visitors and Contractors**

The Company recognises that it has a responsibility to provide a safe and healthy working environment and

acknowledges that this includes controlling the safety and work of visitors and contractors when present on Company premises.

The Company will endeavour to comply with the relevant legal requirements, as contained within the Management of Health and Safety at Work Regulations 1999 and Construction (Design and Management) Regulations 2007, and with the specific Approve Codes of Practice (L144) and guidance issued or approved by the Health and Safety Executive.

In particular the following rules and procedures will be applied in relation to this area or work activity:

(1) Visitors and contractors will not be permitted on Company premises unless specifically authorised and, where necessary, accompanied at all times by a Company employee.

(2) All visitors and contractors will be required to comply with the Company Health and Safety Policy (see `Responsibilities of Visitors and Contractors`) and relevant rules and procedures.

(3) The Company will take all reasonable steps to ensure the health and safety of all visitors and contractors.

(4) The company will provide all visitors and contractors with such information, instruction and training as required to ensure their health and safety and to assist them in complying with their obligations, including:

- Safety policy
- Relevant risk assessments
- Relevant safe systems of work
- Emergency response procedures
- First aid facilities
- Welfare facilities
- Site rules and procedures
- Safety plans
- Site induction training

(5) All visitors and contractors must report to the Company reception / site office upon arrival and leaving.

(6) The Company will take account of the possible presence of visitors and contractors when developing, implementing and practising fire and other emergency procedures.

(7) All visitors and contractors must report immediately any accidents or incidents resulting in injury or damage to the Company.

(8) The Company will record all accidents and incidents involving visitors and contractors and comply with their legal reporting requirements under RIDDOR.

(9) All contractors will be expected to comply with all relevant legal requirements, codes of practice and guidance relating to their operations and work activities.

(10) Only contractors that are on the `Approved List of Contractors and Suppliers` will be authorised to carry out work for or on behalf of the Company.

(11) All contractors will be subjected to a full assessment of their competence and suitability before being placed on the approved list including an assessment of the following documentation and systems :

- Health and safety policy
- Risk assessments
- Safe systems of work or working procedures
- Monitoring arrangements
- Training records
- Accident / incident records
- Enforcement action records
- Suitable references

## **The person/s within the Company responsible for implementing and monitoring the rules and procedures in this area and associated work activities will be:**

Steve Quinn  
Off-site safety coordinator

### **3.25 Lone Working**

The Company recognises that it has a responsibility to provide a safe and healthy working environment and acknowledges that this includes dealing with the risks associated with lone working.

The Company will endeavour to comply with the relevant legal requirements, as contained within the Management of Health and Safety at Work Regulations 1999 and other applicable legislation, and with the specific Approved Code of Practice (L21) and guidance notes (INDG73) issued by the Health and Safety Executive.

Lone worker is defined as `persons who work by themselves without close or direct supervision`.

Examples of lone workers would include:

- People who work in isolation in premises or areas of premises
- People who work outside normal working hours (eg security, cleaners, maintenance staff)
- Mobile workers

The following rules and procedures will be applied in relation to this area and associated work activities:

- (1) The Company believes that there is generally no reason why workers should not work alone subject to the special risks being assessed and control being implemented.
- (2) All lone working activities or situations must therefore be subject to an assessment regarding the special risks involved. This should include any potential hazards such as signs of substance abuse in the home, violence, dangerous animals.
- (3) Where an assessment reveals that a task or job is unsuitable for lone working measures must be taken to ensure that adequate supervision, help or back-up is provided.
- (4) Lone working must not be allowed in respect of tasks involving the use or handling of plant, substances or goods that cannot be carried out safely by one person.
- (5) All lone working activities or situations must have suitable emergency procedures and first aid facilities.
- (6) All lone workers must receive adequate information, instruction and training.
- (7) Assessments for lone working must take into account any possible risks of violence and any special risks to female employees and young persons.
- (8) All lone workers are required to contact their line manager at the end of their working day to let them know that they have finished in their lone working situation. This is to be done immediately following the end of their own working day, regardless of whether the session ends at lunchtime or at the end of the school day. Line managers then have a duty of care to follow up any staff who have not made contact. This contact must be made no later than one hour after the worker's session has ended. If no contact can be made with the worker, line managers are urged to contact the health and safety officer for the company who will instigate further procedures. If no contact can be made with the health and safety officer, staff should contact a member of the Executive Leadership Team. Staff are advised that failure to make contact will result in next of kin and subsequently the Police being contacted.
- (9) Suitable and adequate safe working procedures and arrangements must be developed and implemented for

all lone working activities or situations. Safe working procedures in respect of lone working may include:

- Periodic visits by managers / supervisors
- Regular voice contact with lone workers
- Special alarm devices
- Automatic warning devices
- Return to base/home checks
- Mobile first aid kits

R.E.A.L. Education employ a strict policy in respect of lone workers signing off at the end of their working day. All lone workers are required to contact their line manager at the end of their working day to let them know that they have finished in their lone working situation.

Staff should be aware of the Company's 'Safeguarding Children and Young People' policy which is available via the staff website, or head office.

**The person/s within the Company responsible for implementing and monitoring the rules and procedures in this area and associated work activities will be:**

Steve Quinn  
Managers who supervise lone workers

### **3.26 Violence at Work**

The Company recognises that it has a responsibility to provide a safe and healthy working environment and acknowledges that this includes protecting employees from the risk of violence at work.

Work related violence is defined as `any incident in which a person is abused, threatened or assaulted in circumstances relating to their work`.

The Company will endeavour to comply with the relevant legal requirements, as contained within the Management of Health and Safety at Work Regulations 1999 and other applicable legislation, and with the specific Approve Code of Practice (L21) and guidance notes (INDG69) issued by the Health and Safety Executive.

In particular the following rules and procedures will be applied in relation to this area and associated work activities:

- (1) An assessment of the risks relating to work related violence faced by employees must be carried out for all relevant work activities or situations.
- (2) Management and employees at all levels will be encouraged to take work related violence seriously. It must not be accepted as “part of the job”.
- (3) The Company will adopt suitable measures to minimise exposure of employees to work related violence.
- (4) All employees who could be affected by work related violence must receive adequate and suitable information, instruction and training to assist them in recognising signs of aggression and situations that could result in violence and how to avoid or deal with them.
- (5) The Company will implement and monitor a system for the reporting and investigation of any incidents of work related violence.
- (6) Where work related violence is due to physical violence, mental abuse or threatening behaviour by management or a fellow employee the Company will fully investigate the feasibility of taking legal and/or disciplinary proceedings against any perpetrators as appropriate.

(7) All employees are required and encouraged to report to their manager / supervisor any incidents of work related violence regardless of the circumstances.

(8) Employees who have been victims of, or otherwise affected by, work related violence will receive all support, counselling, legal advice or other assistance from the Company as is necessary to assist them in their recovery.

**The person/s within the Company responsible for implementing and monitoring the rules and procedures in this area and associated work activities will be:**

Steve Quinn  
Training and development manager  
Line managers

### **3.27 Pregnant Workers**

The Company recognises that it has a responsibility to provide a safe and healthy working environment and acknowledges that this includes dealing with the risks to pregnant employees or those returning after maternity leave.

The Company will endeavour to comply with the relevant legal requirements, as contained within the Management of Health and Safety at Work Regulations 1999 and the Workplace (Health, Safety and Welfare) Regulations 1992, and with the specific Approved Code of Practice(L21) and guidance (HSG122) issued by the Health and Safety Executive and other relevant bodies.

In particular the following rules and procedures will be applied in relation to this area and associated work activities:

- (1) The Company recognises that pregnancy is not an illness and that the related health and safety implications can be adequately addressed by health and safety management procedures.
- (2) When carrying out all risk assessments account will be taken of the hazards that could pose a health or safety risk to new and expectant mothers.
- (3) Where hazards that could pose a risk to new or expectant mothers are identified the Company will take appropriate action to remove or reduce the risk, and will inform relevant female employees of childbearing age.
- (4) All expectant mothers must inform the Company in writing of their pregnancy.
- (5) In order to protect the health and safety of an employee and her unborn child it is in the employees' best interests that the Company is informed of the pregnancy as soon as is practicable.
- (6) The Company reserves the right to require expectant mothers to provide written medical evidence of the pregnancy from a qualified doctor.
- (7) Upon receipt of notification from a new or expectant mother the Company will carry out a risk assessment specific to the employee, based on the initial assessment and any medical advice provided by the doctor.
- (8) Following the assessment specific health and safety guidance and instruction will be provided as appropriate. This guidance will usually apply prior to the absence period and, upon her return, whilst she is breast feeding.
- (9) Where there are jobs or tasks that are considered to be unsuitable for expectant mothers due to the serious risk of harm to the mother and/or child the Company will offer suitable alternative work or, where this is not possible, suspend the employee on full pay for as long as is necessary to protect her and her child's health. This action would only be contemplated in extreme circumstances and would be carried out with full and proper consultation.

(10) The Company reserves the right to request that pregnant employees attend a medical consultation, and, if necessary, allocate work in accordance with medical opinion.

(11) For these purposes the Company defines a new or expectant mother as being someone who is pregnant, has given birth within the previous six months, or is breastfeeding.

(12) Anyone who is pregnant and has any concern regarding health and safety at work, because of her pregnancy, must seek advice from her manager / supervisor before undertaking the task about which she has a concern.

## **Return to Work**

(1) Under health and safety legislation an employee may not return to work having taken less than two weeks maternity leave.

(2) The Company recognises that career patterns may be different, because some women choose to combine working and having children.

(3) Women will be given the appropriate counselling, assistance and positive encouragement to return to the Company, so that the skills and experience of valuable employees at every level are utilised effectively.

## **The person/s within the Company responsible for implementing and monitoring the rules and procedures in this area and associated work activities will be:**

Steve Quinn  
Line managers

## **3.28 Young Persons**

The Company recognises that it has a responsibility to provide a safe and healthy working environment and acknowledges that this includes dealing with the risks to young persons at work.

A young person is defined as `any person who has not attained the age of 18`.

The Company will endeavour to comply with the relevant legal requirements, as contained within the Management of Health and Safety at Work Regulations 1999 and the Health and Safety (Training for Employment) Regulations 1990, and with the specific Approved Code of Practice(L21) and guidance (HSG165&199) issued by the Health and Safety Executive and other relevant bodies.

In particular the following rules and procedures will be applied in relation to this area and associated work activities:

(1) The Company will ensure that employed young persons are protected from any risks to their health and safety which result from their lack of experience; their absence of awareness of risks or their lack of maturity.

(2) The Company will not employ a young person to carry out any work which is:

- Beyond their physical or psychological capacity
- Involves exposure to harmful chemicals or agents
- Involves exposure to radiation
- Involves an increased risk of accidents due to their lack of experience etc
- Involves a risk to health from cold, heat, noise or vibration.

(3) When carrying out or reviewing risk assessments particular account must be taken of the special risks that could be incurred to young persons including:



- Their inexperience, lack of risk awareness and immaturity
- The layout of the workplace or workstation
- The work equipment involved
- Any harmful chemicals, agents or processes present or used.
- The organisation of processes and activities
- The health and safety training provided for young persons

(4) No young person must be allowed to start work until the appropriate risk assessment has been completed.

(5) No young person must be allowed to carry out work where the risk assessment identifies a significant risk which cannot be eliminated.

(6) The hours worked by young persons will also comply with the requirements of the Working Time Regulations, in particular:

- a limit of eight hours working time a day and 40 hours a week;
- not to work either between 10pm and 6am or between 11pm and 7am;
- 12 hours' rest between each working day;
- two days' weekly rest and a 30-minute in-work rest break when working longer than four and a half hours.

(7) The above rules and procedures will apply to all students and schoolchildren under 18 years, including those undergoing work experience.

(8) Where the young person is 16 years or less the parents or guardians will be notified of the outcomes of the risk assessment and details of any safeguards which will be used to safeguard the health and safety of the child.

**The person/s within the Company responsible for implementing and monitoring the rules and procedures in this area and associated work activities will be:**

Steve Quinn  
Any line manager in a recruitment position

### **3.29 Alcohol, Drugs and Solvents**

The Company recognises that it has a responsibility to provide a safe and healthy working environment and acknowledges that this may be jeopardised by those who misuse alcohol, drugs or solvents within the working environment.

The Company will, therefore, take appropriate action to protect all employees' health, safety and welfare, company property and general levels of efficiency and success against substance abuse.

#### **Definitions**

Substance abuse is divided into three main categories:

- (a) Alcohol Dependence/Excessive Consumption
- (b) Taking or possession of illegal drugs
- (c) Solvent abuse (inhalation of glues or gases)

Substance dependency is a condition where an employee's consumption of alcohol/drugs/solvents continually or repeatedly interferes with his/her health, attendance or work performance.

Substance intoxication is excessive consumption which may result in irresponsible behaviour, but which is not related to a physical or psychological dependence.

The Company will view each case on its own merits and consider the options of rehabilitation instead of and, or in addition to, disciplinary action.

## **Arrangements**

### **(a) Alcohol Control**

Employees, under normal circumstances, are prohibited from bringing or consuming alcoholic drinks on Company premises or sites. Breach of this rule may result in disciplinary action including dismissal.

### **(b) Illegal Drugs**

The possession or taking of illegal drugs is a criminal offence and as such is viewed seriously by the Company. The possession, use, or sale of illegal drugs on Company premises or sites is strictly prohibited. Breach of this rule may result in disciplinary action, including dismissal.

### **(c) Solvents**

The misuse of solvents on Company premises or sites is strictly prohibited. Breach of this rule may result in disciplinary action including dismissal.

### **(d) Medication**

Many medicines, obtained with or without a prescription, can affect performance at work. Employees in safety critical posts must therefore inform the pharmacist or doctor of their job before taking any medication. All employees must inform their immediate manager if they need to take any medication which may cause drowsiness, impair reflexes or reaction times. If any employee is using a drug that could cause safety or significant performance problems the Company will make every effort to re-deploy them.

Attendance at work under the influence of any substance including those above, which will impair performance or effect health and safety at work, is considered a disciplinary offence, which may result in dismissal.

## **Identification**

The Company will endeavour to recognise the early signs of substance abuse through the provision of suitable training for employees and management. A combination of the following factors should alert managers that substance misuse may be a factor:

- Lateness and absenteeism
- Poor work performance, output and accuracy
- Unreliability
- Poor relations with colleagues
- Impaired concentration, memory and judgement
- Accidents
- Reports from colleagues or other persons

## **With Cause Testing**

In the event that an employee is suspected of being under the influence of either alcohol or drugs the Company

may carry out `with cause testing` in line with the following rules and procedures:

1. The appropriate manager / supervisor should inform the Safety Co-ordinator that he/she believes an employee is under the influence of either alcohol or drugs.
2. The employee should be approached and asked to accompany the Safety Co-ordinator to an office or other safe area. The manager / supervisor should then be contacted and advised of the situation.
3. The employee should be supervised at all times.
4. The manager/supervisor or Safety Co-ordinator should then contact the approved provider of `with cause` testing.
5. After the test is completed the employee should be sent home, if necessary accompanied by a member of staff, on paid suspension pending results of the test.

A positive test result may be deemed as gross misconduct and the employee will normally be dismissed, although Management reserves the right to offer a programme of rehabilitation.

### **With Cause Searching**

Searches for drugs and alcohol may be conducted where the Company has reasonable grounds to believe that drugs or alcohol have been brought on to the Company's premises or sites without permission.

Searches may be conducted of individual's personal effects and or their desk/locker and other areas in the workplace under the individual's control, and Company property within their possession.

This will only be done with the individual's permission but withholding consent will be regarded as gross misconduct.

If drugs or alcohol are found or are in the possession of individuals this may also be regarded as gross misconduct and will normally result in dismissal.

### **Pre-employment Medical Examinations**

The pre employment medical examinations will include testing for both drugs and alcohol.

### **Random Testing for Drugs and Alcohol**

The Company may implement a programme of testing for drugs and alcohol in line with the following rules and procedures:

1. Employees will be chosen at random and will be given no prior warning of the test.
2. A positive test result for either drugs or alcohol will be deemed as gross misconduct and the employee will normally be dismissed, although Management reserves the right to offer a programme of rehabilitation.
3. A positive result for alcohol is defined as 80mg% or above of blood alcohol (or the equivalent) which is the same as would lead to prosecution under the Road Traffic Act.
4. The cut off level for drugs is designed to identify levels of drug metabolites in the system which demonstrate active drug use. There is no safe level for drug use.

### **Information and Training**

1. Prevention campaigns will be staged periodically as part of the Companies overall health and safety communication procedure.

2. Induction courses for new employees will provide substance abuse awareness.
3. The company will provide adequate instruction, information and training to all employees to enable them to recognise the dangers of substance abuse.

## **Record Keeping**

Confidential records will be retained to demonstrate that the Company has taken all reasonable and practicable precautions including:

1. Precautions to safeguard the health, safety and welfare of the employees. This would include details of training and awareness seminars given to employees.
2. Where it has become necessary to discuss a substance abuse issue with an employee written notes will be retained, but the company acknowledges it has an obligation to maintain medical confidentiality.
3. Where disciplinary action has been required, the records retained will be in accordance with the Company's Disciplinary Procedure Policy.

## **Rehabilitation**

1. Employees who believe they have or may be developing a substance dependency are encouraged to seek confidential advice and support voluntarily from their manager / supervisor or Safety Co-ordinator.
2. Employees must seek help from the Company at the earliest opportunity and at any event before being prompted by an impending drugs and or alcohol test or testing positive for drugs and or alcohol.
3. Providing an appropriate programme of treatment is completed and no further positive test results are given the matter will not be treated as a disciplinary issue.

## **Disciplinary Action**

The following will result in disciplinary action being taken up to and including dismissal:

1. Failure to undertake either a "with cause" test or a random test
2. Failure to undertake or complete a treatment programme  
provision or a further positive sample following the start of a treatment programme.

## **Rules and Procedures**

The following rules and procedures must be complied with by all employees:

1. Do not bring alcohol or illegal drugs onto company premises.
2. Do not report for work under the influence of substance abuse (alcohol, drugs or solvent inhalation).
3. Request advice from your GP for possible side-effects of prescribed drugs e.g. drowsiness impaired reflexes.
4. Do not drive or operate machinery if under the influence of a substance.
5. Seek assistance if you believe you have or are developing a substance dependency problem.
6. Be alert to substance abuse symptoms and offer support and advice to colleagues if you suspect that they have a problem - it is a misapprehension that "turning a blind eye" will protect them. Your silence may cause them more harm.

7. Adhere to the obligations placed upon you under the Health and Safety at Work Act etc. 1974, which requires you to take reasonable care of yourself and others who may be affected by your acts or omissions at work.

**The person/s within the Company responsible for implementing and monitoring the rules and procedures in this area and associated work activities will be:**

Steve Quinn  
Line managers

### **3.30 Smoking at Work**

The Company recognises that it has a responsibility to provide a safe and healthy working environment and acknowledges that this includes controlling the risks associated with smoking at work and exposure to secondhand smoke.

Furthermore the Company fully recognises that exposure to secondhand smoke increases the risk of lung cancer, heart disease and other serious illnesses. It also acknowledges that ventilation or separating smokers and non-smokers within the same air space does not completely prevent potentially dangerous exposure.

The Company will endeavour to comply with the relevant legal requirements, as contained within the Management of Health and Safety at Work Regulations 1999 and the Workplace (Health, Safety and Welfare) Regulations 1992, and with the specific Approved Codes of Practice (L21 and L24) and guidance notes (INDG 63) issued by the Health and Safety Executive.

The Company will also ensure compliance with the Health Act 2006 and regulations made under that Act, namely the Smoke-free (Premises and Enforcement) Regulations 2006 and Smoke-free (Signs) Regulations 2007.

In particular the following rules and procedures will be applied in relation to this area and associated activities:

- (1) The Company does not permit any employees, visitors, customers, consultants, contractors and other persons to smoke in any enclosed and substantially enclosed areas situated on company premises.
- (2) The above requirement also applies to any company vehicle or other vehicle operating on company business.
- (3) Appropriate `no-smoking` signs will be clearly displayed at the entrances to and within the premises, and in all smoke-free vehicles.
- (4) Employees are not permitted to smoke.
- (5) The Company will consider providing advice and assistance to smokers regarding how to reduce or give up smoking.
- (6) Local disciplinary procedures will be followed against any member of staff who does not comply with this policy.
- (7) Staff are also advised that failure to comply with smoke-free law may also make them liable to receive a fixed penalty fine and possible criminal prosecution by the local council.
- (8) Employees concerned about the implementation of this policy or any other smoking related issues should report the matter to the appropriate manager / supervisor.

**The person/s within the Company responsible for implementing and monitoring the rules and procedures in this area and associated work activities will be:**

### **3.31 Sun Exposure to Outdoor Workers**

The Company recognises that it has a responsibility to provide a safe and healthy working environment and acknowledges that this includes ensuring that the health risks to outdoor workers associated with exposure to ultra violet (UV) radiation from the sun are adequately controlled.

The hazards and other problems associated with exposure to the sun include:

- Skin damage, including sunburn, blistering, skin ageing and skin cancer
- Heat stress
- Dehydration
- Damage to the eyes due to glare
- Increased skin sensitivity to sunlight caused by some types of medication
- Increased skin sensitivity arising from contact with certain chemicals such as dyes, wood preservatives and coal-tar
- Increased risks of skin cancers to people with fair or freckled skin or with fair or red hair

The Company will endeavour to comply with the relevant legal requirements, as contained within the Management of Health and Safety at Work Regulations 1999, and with the specific Approved Code of Practice (L21) and guidance (INDG 337 and 147) issued by the Health and Safety Executive.

In particular the following rules and procedures will be applied in relation to this area or work activity:

- (1) In all situations where outdoor work is scheduled to be carried out during the daytime period of the summer months (ie. April to September), a comprehensive risk assessment must be completed in order that the appropriate sun protection measures are developed and put into place.
- (2) Employees must not be allowed to carry out any work for the company without wearing a shirt or other suitable overclothing. This rule is to be applied in order to protect the health and safety of employees and also to maintain the correct image and reputation of the company at all times.
- (3) Suitable clothing, including long-sleeved shirts and suitable hats, must be provided for the use of all employees who regularly work outdoors during the summer period.
- (4) Sun protection advice must be provided as a routine part of health and safety information and training to relevant employees in order to raise and maintain awareness of the associated health problems and recommended means of protection.
- (5) Where employees are unable to cover parts of their skin sunscreen of at least SPF (Sun Protection Factor) 15 will be provided.
- (6) Outdoor workers must be encouraged to take their breaks in the shade, if possible, rather than staying out in the sun.
- (7) Where possible managers/supervisors must consider scheduling work to minimise exposure to sun, particularly during peak periods of sunshine around midday or early afternoon.
- (8) Suitable and sufficient supplies of drinking water must be maintained for outdoor workers in order to avoid dehydration.
- (9) Water supply points and rest areas must, where possible, be located in areas with shade.
- (10) Outdoor workers must be encouraged to check their skin regularly for unusual spots or moles that change size, shape or colour and to seek medical advice promptly if they find anything that causes them concern.

**The person/s within the Company responsible for implementing and monitoring the rules and procedures in this area and associated work activities will be:**

Steve Quinn  
Learning managers  
Vocational group managers

### **3.32 Pressure Systems and Equipment**

The Company recognises that it has a responsibility to provide a safe and healthy working environment and acknowledges that this includes ensuring that the health and safety risks associated with pressure systems and equipment are adequately controlled.

Examples of pressure systems and equipment include:

- Boilers and steam heating systems
- Pressurised process plant and piping
- Compressed air systems (fixed or portable)
- Pressure cookers, autoclaves and retorts
- Heat exchangers and refrigeration plant
- Valves, steam traps and filters
- Pipework and hoses
- Pressure gauges and level indicators

The hazards associated with pressure systems and equipment include:

- Impact from the blast of an explosion
- Impact from the release of compressed liquid or gas
- Impact from parts of equipment that fail or flying debris
- Contact with a released liquid or gas, such as steam
- Fire resulting from escape of flammable liquid or gas

The Company will endeavour to comply with the relevant legal requirements, as contained within the Pressure Systems Safety Regulations 2000 and the Pressure Equipment Regulations 1999 and with the specific Approved Code of Practice (L122) and guidance (INDG 178 and 261) issued by the Health and Safety Executive.

In particular the following rules and procedures will be applied in relation to this area or work activity:

- (1) All newly installed pressure systems and equipment must be suitable for the intended use and installed correctly by approved competent contractors.
- (2) All new pressure systems and equipment must be installed in order to allow it to be operated and maintained easily and safely.
- (3) Records must be kept of all systems and equipment, including details of the liquid or gas contained and relevant process conditions (pressures, temperature etc) and safe operating limits.
- (4) Suitable operating instructions and emergency procedures must be kept adjacent to systems and equipment and made available to the relevant employees.
- (5) All relevant employees must be provided with suitable and adequate information, instruction and training.
- (6) Suitable and sufficient protective devices must be provided to systems and equipment and steps taken to ensure that are correctly adjusted and in good working order at all times.

- (7) All systems and equipment must be properly maintained in accordance with an agreed programme of regular inspection and maintenance.
- (8) Any maintenance must be carried out by approved competent contractors in line with an agreed safe system of work.
- (9) Any defective systems, equipment, fittings or pipework must be reported immediately to the appropriate manager/supervisor.
- (10) Before any pressure system or equipment is used a written scheme of examination for the system must be drawn up by a suitable competent person.
- (11) When arranging for a written scheme of examination steps must be taken to ensure the competent person in question has the necessary level of knowledge, experience and independence to carry out the function.
- (12) The written scheme of examination must cover every pressure vessel and all protective devices, pipework etc.
- (13) Inspections must be arranged and carried out by a competent person at the frequency and in accordance with the written scheme.

**The person/s within the Company responsible for implementing and monitoring the rules and procedures in this area and associated work activities will be:**

Steve Quinn  
Off-site safety coordinator

### **3.33 Personal Hygiene**

The company recognises that good personal hygiene practice is important in ensuring a safe and healthy place of work in that it reduces the risk of the spread of germs and infection between employees.

It is particularly important that high standards are maintained where employees are exposed to substances or conditions which may be hazardous to health.

The following standards and procedures are therefore required in relation to personal hygiene and the facilities available to assist employees in achieving these standards.

#### Management responsibilities

Managers should ensure that the following requirements are met:

1. Applicants for employment should be screened for pre-existing health conditions which may have been caused or exacerbated by poor personal hygiene (professional medical assistance and advice should be obtained where required).
2. Employees should receive sufficient information and instruction in the standards of personal hygiene that are required and the facilities that are available at the workplace to assist in achieving these standards.
3. Personal protective equipment should be stocked, issued and maintained in accordance with the policy, and replaced or disposed of at the appropriate time.
4. Suitable laundry arrangements should be made for cleaning of overalls and uniforms.
5. Suitable facilities should be arranged for itinerant workers and those on temporary or mobile sites.
6. Work conditions and facilities, including washing and sanitary conveniences, should be adequate to enable workers to maintain good standards of personal hygiene.



7. Employees should comply with company rules on eating, drinking and smoking at the workplace.
8. Potential hygiene problems should be dealt with quickly and effectively, taking into consideration the need for medical confidentiality where this applies.
9. The company disciplinary procedure should be used to improve performance for employees persistently displaying poor personal hygiene standards which put at risk the health and safety of themselves or others.

### Employee responsibilities

Employees are responsible for ensuring that they maintain good standards of personal hygiene whilst at the workplace and for ensuring compliance with the company's working arrangements for achieving this requirement. Where problems are identified in working arrangements or facilities or with the health and safety of the individual, these must be reported to a responsible person immediately.

Employees must make full and proper use of facilities which are provided to assist in achieving the required standards of personal hygiene. These facilities include:

- (i) washrooms and showers
- (ii) provision of soaps, cleansers, barrier creams and after-work creams
- (iii) laundering arrangements for uniforms and overalls
- (iv) personal protective equipment and clothing.

All matters relating to personal hygiene will be handled sympathetically and, where relevant, with medical confidentiality. Employees who deliberately flout the prescribed rules on personal hygiene, which could affect the health of others, will be liable to disciplinary procedures.

### Safe Systems of Work

Observing the following guidelines on personal hygiene will minimise health and safety problems.

1. Before starting work, check that there are no signs of skin irritation or open wounds.
2. Cover open wounds with suitable waterproof dressings and ensure that existing dressings are clean before starting work.
3. Avoid direct contact with hazardous substances at work.
4. Ensure that protective clothing is clean, changed when necessary and regularly washed where appropriate.
5. Ensure that protective clothing is repaired or replaced when necessary.
6. Observe the rules regarding eating, drinking and smoking in the working area.
7. Where there is a possibility of contamination, wash hands and face before eating, drinking or smoking and thoroughly wash or shower at the end of each shift.
8. Wash hands before and after using toilet facilities.
9. Do not keep contaminated rags or materials in pockets.
10. Make full use of barrier creams, cleansers and other skin creams.
11. Refrain from spitting in the workplace.
12. Report any problems to a responsible person without delay.

### Summary

Poor standards of personal hygiene increase the risk of exposure to hazardous substances and other harmful agents at the workplace. They may also cause contamination and affect the quality of the product. The following steps will reduce the risk of the adverse effects associated with poor personal hygiene:

1. take responsibility for health and safety by making full and regular use of all personal hygiene facilities provided by the employer;
2. follow safe systems of work to avoid creating unnecessary problems; and
3. report anything of concern without delay to a responsible person.

### **3.34 Provision of Welfare Facilities**

The Company recognises that it has a responsibility to provide a safe and healthy working environment and acknowledges that this includes ensuring the provision of welfare facilities for employees.

The Company will therefore endeavour to provide suitable and adequate facilities that comply with the relevant legal requirements, as contained within the Workplace (Health, Safety and Welfare) Regulations 1992 and Construction (Design and Management) Regulations 2007, and with the specific Approved Codes of Practice (L24 and L144) issued by the Health and Safety Executive (HSE).

In particular the following facilities will be provided as far as is reasonably practicable at premises provided by the company and at workplaces or sites where company employees are required to work for significant periods of time:

#### **Sanitary conveniences and washing facilities**

Suitable and sufficient sanitary conveniences and washing facilities will be provided at readily accessible places. They and the rooms containing them will be kept clean, adequately ventilated and lit. Washing facilities will be located close to sanitary conveniences and/or changing facilities and will have running hot and cold or warm water, soap and clean towels or other means of cleaning or drying. If required by the type of work, showers will also be provided. Men and women will have separate facilities unless each facility is in a separate room with a lockable door and is for use by only one person at a time.

#### **Drinking water**

An adequate supply of high-quality drinking water, with an upward drinking jet or suitable cups, will be provided. Water will be provided in refillable enclosed containers where it cannot be obtained directly from a mains supply. Water containers will be refilled at least daily (unless they are chilled water dispensers where the containers are returned to the supplier for refilling). Bottled water/water dispensing systems may be provided in some circumstances as a secondary source of drinking water. Drinking water will be marked if there is a significant risk of people drinking non-drinking water.

#### **Accommodation for clothing and facilities for changing**

Adequate, suitable and secure space will be provided to store workers' own clothing and special clothing. As far as is reasonably practicable the facilities will allow for drying clothing. Changing facilities will also be provided for workers who change into special work clothing. The facilities will be readily accessible from workrooms and washing and eating facilities, and will ensure the privacy of the user, be of sufficient capacity, and be provided with seating.

#### **Facilities for rest and to eat meals**

Where possible or practicable suitable and sufficient, readily accessible rest facilities will be provided for the use of employees.

Seats will be provided for workers to use during breaks. Rest areas or rooms will be large enough and have sufficient seats with backrests and tables for the number of workers likely to use them at any one time, including suitable access and seating for any disabled employees.

Where workers regularly eat meals at work, suitable and sufficient facilities will be provided for the purpose. Such facilities will also be provided where food would otherwise be likely to be contaminated.

Work areas can be used as rest areas and as eating facilities, provided they are adequately clean and there is a suitable surface on which to place food.

Where provided, eating facilities will include a facility for preparing or obtaining a hot drink. Where hot food cannot be obtained in or reasonably near to the workplace, workers will be provided with a means for heating their own food (eg microwave oven).

### **3.35 Off-site visits, residentials and adventurous activities**

#### **Risk management and assessment**

The company engages in various off-site forms of education delivery as part of delivering an innovative and experiential curriculum for its students. In order to ensure that all activity is appropriately risk managed according to the degree of risk, there are three tiers of assessment that are applicable.

Tier 1 activity is deemed as any off-site education delivery that is low risk and occurs as part of a student's day to day education in the community. Tier 1 activity is covered under a generic risk assessment and is supported by various pieces of other information relating to the student, the activity and the venue. These include the student's individual risk assessment, any pertinent generic activity risk assessments and also the venue information sheet which is available in the 'Venues' area of the staff hub.

Tier 2 activity is classed as medium risk activity that occurs as an extension of a student's curriculum and requires further expansion by means of a specific risk assessment relating to the activity. These types of activities include day trips outside of the student's usual locality, trips to theme parks, major cities, or any trip which involves bringing a group of students together who do not usually come together as part of their main timetabled activities. These activities must be risk assessed and signed off by either a learning manager or a group vocational provision manager.

Tier 3 activity is classed as any adventurous based activity, residential trips, or trips abroad. These types of activities require robust specific risk assessments to be in place and must be signed off by a member of the Executive Leadership Team.

For tier 2 and 3 trips there must be a designated trip leader who must either ask the third party location for an up-to-date copy of their venue risk assessment, or conduct their own venue assessment prior to the trip. Secondly, a specific risk assessment must be conducted with regards to the activity taking place. This must take into consideration the hazards and risk presented by the activity, the suitability of the activity with specific thought to the ability of the group undertaking the activity, the competency and experience of the person leading the activity, staff: student ratios and supervision arrangements, first aid provision, travel requirements and finally a contingency arrangement should be in place if the activity is unable to go ahead.

Both risk assessments must be completed and signed off by the relevant manager or member of the Executive Leadership team prior to the visit, using the standard (RA1) risk assessment form. Guidance on completing the form can be found in the 'Risk Assessment' guidance notes earlier in the manual.

#### **Adventure activities using licensed providers**

Before undertaking any activity that will involve caving, climbing, trekking, skiing or water sports, the group

leader must check that the third party provider holds a license as required by the Adventure Activities Licensing Regulations 2004. These regulations apply to adventure activities that take place in England, Scotland and Wales and ensure that third party providers offering adventurous activities have been subject to Government rigour with regards to provision and quality of health and safety and that all staff working on their behalf are deemed competent to deliver the activity.

Any establishment which does not hold the appropriate license must not be used by the school until such a time when a license has been gained.

#### School staff driving the school minibus

School staff are able to drive the school minibus without any special license, as long as the following conditions are met:

- The staff member obtained their car driving license before January 1997; OR
- The staff member obtained their car driving license later, but has held it for at least two years, AND
  - o Is not being paid to drive the minibus (because exemption depends on no consideration being received by the driver); AND
  - o The minibus weighs no more than 3.5 tonnes and is not used for hire or reward

As with all staff using any vehicle to transport children and young people, the administration team must have copies of their full UK driving license (including counterpart) and up-to-date copies of their insurance and M.O.T. certificate. It is the responsibility of the company to ensure that any transport vehicles that are school owned, are serviced, insured and maintained to a safe standard at all times.

#### Parental consent to off-site activities

The company does not require specific consent for pupils to take part in the majority of off-site activities, as most of these activities take place during the school day and are a normal part of a student's education. Parents should however be aware of their child's location at all times and of any additional safety measures required. It is the responsibility of the programme coordinators to ensure that timetables are updated and sent out prior to the school term to give parents this information.

The company will however request specific written consent for any activities that require a higher level of risk management or those that take place outside of school hours. This consent form will be activity specific and will detail all relevant information pertinent to the activity. Consent will be sought for visits including adventurous activities, off-site sporting events, day trips and residential visits. Parents/carers will be told in advance of each activity and will be given the chance to withdraw their child for any school trip or activity covered by a consent form.