

Health & Safety Policy

SR Apprenticeships regards the promotion of the Health & Safety at Work Act 1974 and the Environmental Protection Act 1990 as an essential objective for all staff. We are committed to safeguarding the health, safety and welfare of all its employees and all other persons affected by its operations and undertakings. To this end, the SR Apprenticeships management promotes a proactive approach to identifying and reducing risks to facilitate a safe working environment for all employees and those working under its control.

Some SR Apprenticeships service users may be from particularly vulnerable groups and operations are accordingly conducted with emphasis on all apprentices being entitled to a safe, healthy and supportive learning environment.

SR Apprenticeships seeks to make the most effective and efficient use of all resources to encourage employees and apprentices to embrace a positive Health and Safety culture. SR Apprenticeships will not put apprentices at risk by placing them in work situations where health and safety are not satisfactorily addressed. As part of this commitment, SR Apprenticeships places Health and Safety considerations at the heart of its business activities.

SR Apprenticeships will work in partnership and cooperation with our employers to ensure that health and safety measures are in place and maintained.

SR Apprenticeships will review this Policy at least annually, ensuring that it reflects both the intentions and the overall direction of the organisation and to also ensure it continues to be appropriate to the nature and scale of its Health and Safety risks and impacts.

Scope

This policy applies to all SR Apprenticeships offices, operations and activities, and to all SR Apprenticeships employees at all levels. The aims, organisation and arrangements of this policy will equally apply to all SR Apprenticeships operations and activities conducted on sites beyond SR Apprenticeships control wherever SR Apprenticeships employees are designated to perform their contractual duties.

All employers with apprentices on programme with SR Apprenticeships have their own obligations to comply with Health and Safety Legislation, as defined by their own policies and the ESFA Funding Regulations, which are not set out in the scope of this policy. However, SR Apprenticeships will conduct appropriate due diligence for all new employers with the aim to ensure that employers of apprentices comply with the legislation and all apprentices are safe whilst at work. This policy will set out SR Apprenticeships' aims to complete due diligence and the actions that will be taken to provide satisfactory facilities within our offices and working environments for our apprentices.

Aims and Objectives

In particular, SR Apprenticeships will:

- Comply fully with the requirements of the Health and Safety at work Act 1974, the Management of Health and Safety at Work Regulations 1999 (2006) and all other relevant legislation, regulations, codes of practice and guidance pertaining to Health and Safety in the workplace in all operational activities.
- Ensure that, on a continual improvement basis, Health and Safety hazards and aspects are identified, risks assessed and suitable management controls put in place to prevent injury, ill health or other adverse impacts.
- Develop its management processes to ensure that Health and Safety factors are fully considered during planning and implementation of any project or activity.
- Engage with employers, employees, contractors and visitors to further reduce Health and Safety risks and impacts associated with working for, with, or on behalf of SR Apprenticeships.
- Engage with apprentices and embed sound Health and Safety knowledge and awareness in all learning undertaken for their chosen vocation.
- Provide a safe and healthy learning environment where apprentices feel safe from risk or intimidation.
- Ensure that exercising due diligence in respect of Health and Safety responsibilities is a condition of employment.
- Maintain a commitment to inform, instruct and train all employees in all Health and Safety matters.
- Ensure all employees are aware of, and fulfil, their statutory and contractual duties to safeguard their own health, safety and welfare, and that of others who may be affected by their acts or omissions.

- Require all employees to co-operate with SR Apprenticeships in all matters related to health and safety.
- Ensure, where required, sufficient resources are made available in the pursuance of maintaining a safe and healthy work environment.
- Review the Health and Safety policy at least annually.

Roles and Responsibilities

The Managing Director has overall operational responsibility for health and safety management and performance across the organisation, with assistance from the Operations Director and Managers.

The Directors, Senior Management Team (SMT), and Managers are responsible for promoting Health and Safety compliance across the organisation and their respective departments or areas of responsibility. In particular, Operations Director and Managers have responsibility for ensuring operational compliance with this policy and all Health and Safety arrangements on a day to day basis within their Departments.

The day-to-day management of Health and Safety on sites and premises beyond the control of SR Apprenticeships is delegated to persons in charge of such work in accordance with the organisation's structure and their operational responsibilities.

All employees at all levels of the organisation are responsible for their own Health and Safety performance and levels of compliance. All employees are required to co-operate fully with the organisation in all matters related to Health and Safety to enable SR Apprenticeships to fulfil its legal duties. Such responsibilities include, but are not limited to:

- Meeting the statutory requirements set out in section 7 and 8 of the Health and Safety at Work Act, 1974.
- Reporting any unsafe act or unsafe condition to the Health and Safety Lead.
- Reporting any concerns where there are identified shortcomings in the organisation's Health and Safety arrangements.

Such responsibilities are absolute and cannot be transferred to others.

The Health and Safety Lead is responsible for providing such advice as is necessary to assist SR Apprenticeships and its employees to comply with their statutory provisions. Information, instruction and training will be arranged and provided where it is identified that an absence of specific knowledge and/or skills may contribute to an increase in operational risk. Employees with additional specific duties, such as First Aiders and Fire Marshals, will be provided with the required training to enable them to execute their duties correctly and safely.

Where employees have doubts about safe working practices, they should seek advice from their Manager or the Health and Safety Lead.

SR Apprenticeships will update employees on any and all relevant Health and Safety information, including revised working practices and updates to policies.

It is SR Apprenticeships intention to consult with employees on all matters that may impact on their health, safety and well-being. Equally, the organisation welcomes suggestions, ideas and participation from all employees with regards to improvements in Health and Safety management. Consultative groups will convene periodically, such as team meeting, where Health and Safety will be represented as an agenda item and discussion point to facilitate open communication.

Arrangements

Suitable arrangements for the management of Health and Safety exist and are dictated by policy. Arrangements for Health and Safety will be reviewed at least annually or where changes in operations are implemented or whenever deficiencies are identified through internal or external audits or by any other means.

Accidents and Incidents

Accidents and Incidents - Internal

All accidents, incidents or near misses must be reported without delay to a relevant Manager or qualified First Aider and the Health and Safety Lead. A “near miss” is an event where no injury or damage is caused but did have the potential to do so. The accident/incident report form is available from Head Office and from the Health and Safety Lead. Managers will ensure that all accidents, incidents or near misses under their area of control are duly recorded and reported.

Specific injuries, diseases and dangerous occurrences are reportable by law under the Reporting of Injuries, Diseases and Dangerous Occurrence Regulations (RIDDOR) 2013. Where such an occurrence arises, the Health and Safety Lead, in conjunction with Directors, is responsible for submitting the required report to the relevant enforcing authority.

SR Apprenticeships have fully trained First Aiders on site to provide any suitable first aid in the event of an injury or instance of ill health. In the absence of a qualified First Aider, a relevant Manager will act as an Appointed Person to take charge of the situation and, where necessary, summon professional emergency assistance. An Appointed Person may not render any first aid, unless they are qualified to do so. Where any serious accidents or incidents are reported, the Health and Safety Lead will conduct an appropriate and timely investigation to establish cause and determine suitable corrective or preventive actions.

Revised operational controls resulting from such investigations will be communicated to all SR Apprenticeships employees.

Accidents and Incidents – Apprentices

In the event of an accident or ill health whilst the apprentice is at their normal place of work whether undergoing apprenticeship training at the time or not, SR Apprenticeships would seek to be notified of such event and where required the details surrounding the accident or ill health. SR Apprenticeships would fully support the employer and the apprentice where required and or necessary. SR Apprenticeships would continue regular communication throughout the period of ill health or until the apprentice is recovered from any accident providing any information, advice and guidance along with support for both the apprentice and employer. In the event of a break in learning to cover any period of ill health or as a result of an accident; as and when the learner and employer are ready for the return, SR Apprenticeships will assist in preparing both parties for this.

Whilst the employer bears the main responsibilities in relation to the health and safety of its employees, SR Apprenticeships recognises that it has an important role to play in ensuring the health and wellbeing of its apprentices. We are committed to assist and provide a supporting role to employers in their health and safety duties.

In the event of an accident or ill health whilst the apprentice is not at their normal place of work we would seek to be notified. We expect our staff to recognise visible signs of ill health or injury with their apprentices and notify the leadership team. SR Apprenticeships would notify the apprentice's employer of the matter with the apprentice's permission following an assessment of the impact the ill health or injury may have on both their ability to continue with the apprenticeship and their ability to complete their duties at work. SR Apprenticeships would aim to fully support the employer and the apprentice where required as necessary. SR Apprenticeships would continue regular communication throughout the period of issue or until the apprentice is recovered to provide information, advice and guidance along with support for both the apprentice and employer. Following a report of an accident or ill health involving an apprentice, SR Apprenticeships will continue to monitor the apprentice's progress in all outcomes for a period of time and provide the necessary support and reasonable adjustments to enable the apprentice to fulfil and complete their apprenticeship.

Monitoring whilst in employment - Apprentices

- The level of monitoring may depend on a range of factors including:
 - Awarding body requirements
 - Length of programme
 - Ability of apprentice and/or any special needs or other circumstances, including any disability and/or medical/health condition.
- All visits should be arranged in advance by telephone & visiting staff should be known to the apprentice.
- Any issues identified during monitoring must be addressed immediately.
- If the apprentice is identified to be at health and safety risk, the placement must be terminated with immediate effect.
- If the placement is terminated SR Apprenticeships will endeavour to keep the apprentice on programme whilst aiding them in seeking alternative employment.

Recording and reporting of health and safety - Apprentices

SR Apprenticeships will ensure systems and procedures are in place for incident reporting, escalation, investigation and where applicable, notification to the local authority. It is the responsibility of the employer to record and report incidents regarding health and safety, however, it is the intention of SR Apprenticeships to work in collaboration and cooperation with all its employers and expect that all health and safety incidents would be reported to SR Apprenticeship as soon as possible to ensure the safety and welfare of our apprentices.

Control of substances hazardous to health (COSHH) - Internal

People come into contact with a wide range of hazardous substances at work that may arise from a number of sources, for example:

- Solvents, acids, lead, etc. used directly in processes.

- Fungus, mites, etc. that arise naturally.
- Cleaning chemicals, etc. used in services.
- Exhaust fumes, dust, gases, etc. given off as by-products.

The risk to the employee when coming into contact with a hazardous substance is dependent on the route of exposure. There are a number of routes through which a person may become exposed and substances may prove hazardous through only one or several of these routes:

1. Inhalation e.g. dusts, fungus, solvents, paints, exhaust fumes, organisms, etc
2. Ingestion e.g. heavy metals, organisms etc
3. Contact with the skin e.g. cleaning chemicals, solvents, used engine oil, etc
4. Absorption through the skin e.g. solvents
5. Injection into the body e.g. drugs
6. Introduction into the body via wounds e.g. hepatitis, Weil's disease etc.

In many cases exposure to work related substances may, if it remains uncontrolled, lead to illness or even death in severe cases.

Consequently the Control of Substances Hazardous to Health (COSHH) Regulations have been formatted to ensure that employers at SR Apprenticeships take reasonable steps to reduce the risk to employees from exposure to hazardous substances in their working environment.

Risk Assessment

Risk Assessment - Internal

The means to establishing effective operational controls across the organisation will be achieved through risk assessment. Risk assessment will identify potential hazards, who may be harmed and level of risk, document existing controls, and advise on further controls that may be required to reduce such risk to an acceptable level.

Risk assessments will be reviewed at least annually, or where a change to operations has been identified.

The requirement for risk assessments may be generated by, but are not limited to:

- Accident and incident reports or investigations.
- External compliance audits.
- Internal compliance audits.
- Lone Working arrangements.

- Disclosures of medical conditions.
- Introduction of new processes, equipment or substances.
- Works carried out by external contractors.
- Requirements of those more susceptible to risk (young persons, expectant mothers etc.). All risk assessments will be recorded and made available to all relevant or interested parties.

Risk Assessment – Apprentices

- It is the responsibility of the employer to conduct their own risk assessments on their sites. However, SR Apprenticeships conduct due diligence which checks employer's completion of relevant risk assessments and reporting of control measures to SR Apprenticeships.
- Job role specific risk assessments will be revisited when changes in circumstances are identified.

Provision of Work Equipment - Internal

SR Apprenticeships will provide suitable work equipment as necessary to enable employees to carry out their work effectively. Where work equipment is provided, SR Apprenticeships will fulfil its statutory duties under the Provision and Use of Work Equipment Regulations (PUWER) 1998 by ensuring the suitability and safety of all equipment in relation to its intended use. Where work equipment is reported to be faulty, defective or unsafe, the organisation will make arrangements to have the equipment replaced or competently repaired.

Equally, all employees are expected to use work equipment correctly and safely and solely for its intended purpose. Employees must not misuse any work equipment provided and must make every endeavour to protect equipment from theft and/or damage.

Display Screen Equipment (DSE) - Internal

SR Apprenticeships recognises that the majority of its employees are required to use DSE for significant periods of time on a regular basis in carrying out their appointed work duties. All employees are required to complete a DSE assessment to highlight anyone who may be at risk from harm through using DSE. Users of DSE will be provided with sufficient information, instruction and training to provide awareness of the potential risks associated with DSE use.

To facilitate this aim, SR Apprenticeships has produced a DSE Safety Strategy to communicate suitable and sufficient information and instruction on how to recognise and effectively manage the risks associated with using DSE.

Equally, although not within the scope of The Health and Safety (Display Screen Equipment) Regulations 1992, apprentices will be provided with sufficient awareness training embedded into their vocational learning to enable them to use DSE safely.

Manual Handling Operations - Internal

SR Apprenticeships operations does not generally rely on or require any significant manual handling or repetitive movements. However, where the requirement exists to occasionally lift or carry any items or objects, such as moving archive boxes or furniture, an assessment of risk will be completed by the relevant Manager and/or Health and Safety Lead. The assessment will focus on four key elements:

- Task. What is required to be done in terms of moving something from one area to another.
- Individual. Individual capability of the person required to perform the task.
- Load. Assessment of the nature of the load – weight, size, stability etc.
- Environment. Assessment of the surroundings, such as floor condition, lighting, changes in floor level.

Employees are not required, or expected, to lift and carry objects or loads beyond their individual capabilities. Employees should never attempt to lift or move any load they feel is beyond their own capability or likely to cause them injury. Expectant mothers are prohibited from lifting or carrying any load and should seek assistance from their Manager if they require anything lifting or moving.

SR Apprenticeships expects employees to store items, such as archive boxes, in a safe and orderly fashion. Such items must not be stored above chest height and must only be positioned such that no stretching, reaching or twisting is required to lift them or to set them down.

All employees have a statutory duty to protect themselves, and others, from harm or injury.

Other Provisions – Internal

SR Apprenticeships will constantly monitor and measure all performance against expected standards for Health and Safety and will do this through various mechanisms. Where risk is judged to be present, provision will be made to assess such risk and implement suitable control measures. Such other provisions may include, but are not limited to:

- Safeguarding.
- Personal Protective Equipment.
- Stress.
- Acts of Terrorism.
- Driving for Work.
- Violence at Work.
- Lone Working.

Control Measures - Internal

In certain circumstances it may be necessary to put control measures in place to ensure that exposure to a substance is minimised. In deciding on the control measure to be taken the following hierarchy will be followed:

- Eliminate the hazard altogether
- Use a safer substance (substitution)
- Enclose the process
- Use engineering systems e.g. extraction or ventilation
- Safe systems of work
- Personal protective equipment (this is the last resort)

When using control measures and / or personal protective equipment it is necessary to meet certain requirements of the COSHH Regulations:

- Employers must take all reasonable steps to ensure that employees are using the control measures and the personal protective equipment (PPE) provided
- Employers must take all reasonable steps to ensure that the control system or PPE are being maintained and are working efficiently. This includes keeping suitable maintenance records
- PPE must be suitable for the purpose for which it is provided
- PPE must comply with any design standards laid down
- Employees have a duty to make full and proper use of any control measures and the PPE provided

Employer Due Diligence - Apprentices

SR Apprenticeships keeps a central database of all apprentice employers.

SR Apprenticeships aims to ensure that all health and safety standards are met by conducting employer due diligence prior to any apprentice enrolments with the employer. This may include:

- Contract for Services
- Commitment Statement
- Verification of the following policies in place:
 - o Health and Safety
 - o Including Risk Assessment that includes for young persons and vulnerable groups
- Safeguarding and Prevent
- Equality and Diversity
- Bullying, Discrimination and Harassment
- Employer Liability Insurance
- Employee Handbook
- Employee Contract of Employment
- Apprenticeship Agreement
- Induction into employment

Should an employer identify that they do not have these in place, an apprentice cannot be enrolled on programme.

Communication – Internal

This policy sets out SR Apprenticeships commitment and intent to establish, implement and maintain a safe and healthy environment in all of its premises for all who use them, whether they are employees, apprentices, visitors or contractors.

The contents of this policy will be communicated to all employees during induction and thereafter at each subsequent policy review.

Absolute compliance with this Health and Safety Policy and all associated policies pertaining to Health and Safety matters, is a condition of employment.

This policy is available, and will be communicated, to all interested parties, is agreed by the Board of Directors and will be reviewed at least annually.