




A general statement of intent with regard to health and safety

This document is a statement of the KHK People Development Ltd.'s policy and commitment to the health and safety of its employees at work, and ensuring that all learning takes place within a safe, healthy and supportive environment and is in accordance with the Health and Safety at Work etc. Act 1974 and all applicable regulations under the Act. The policy is extended to include the safeguarding and obligations placed upon the learners and other stakeholders. KHK People Development Ltd Training recognises fully the benefits, financial and otherwise, of providing a healthy, safe environment for all its stakeholders. The person with overall responsibility is Karen Hope CEO

Signature	
Date	March 2018

HEALTH & SAFETY POLICY AND SAFEGUARDING POLICY CONTENTS

SECTION 1

PURPOSE OF THE POLICY

SECTION 2

THE ORGANISATIONAL ARRANGEMENTS IN PLACE FOR IMPLEMENTING THE POLICY

1 INTRODUCTION

- COMPANY DIRECTORS
- HEALTH AND SAFETY ADVISOR

2 GENERAL DUTIES OF EMPLOYEES AT WORK (ALL MEMBERS OF STAFF)

- IN PARTICULAR ALL MEMBERS OF STAFF MUST
- LEARNERS
- SPECIFIC RISK ASSESSMENTS
 - *Reduction of risks*
 - *Pre-existing requirements*
 - *Practical applications*
 - *Vulnerable Adults and New/Expectant Mother*
 - *Vulnerable Adults*
 - *New Expectant Mothers*
 - *Visitors*

SECTION 3

STATEMENT OF ARRANGEMENTS

1 SAFETY MANAGEMENT SYSTEM

2 RISK ASSESSMENTS

2.1 GENERAL

2.2 CONTROL OF SUBSTANCES HAZARDOUS TO HEALTH (COSHH)

2.3 DISPLAY SCREEN EQUIPMENT

3 SAFE SYSTEMS OF WORK/WORKPLACE PRECAUTIONS

4 WORK EQUIPMENT DEFINITION

4.1 CONFORMITY

4.2 RISK ASSESSMENT

4.3 INFORMATION AND TRAINING

5 PERSONAL PROTECTIVE EQUIPMENT (PPE)

6 FIRST AID

7 FIRE PRECAUTIONS AND EVACUATION PROCEDURES

7.1 EVACUATION PROCEDURES

7.2 FIRE ALARMS

7.3 EMERGENCY LIGHTING

7.4 TRAINING

8 MANUAL HANDLING

9 MECHANICAL AND ELECTRICAL SAFETY

9.1 PORTABLE APPLIANCE TESTING

10 WORK RELATED ILL HEALTH

10.1 OCCUPATIONAL HEALTH SERVICES AND WORK-RELATED STRESS

11 REPORTING OF ACCIDENTS AND INCIDENTS AND NEAR MISSES

12 COMMUNICATION AND REPORTING

13 CONTRACTORS AND SUB-CONTRACTORS

14 VISITORS

15 STAFF HEALTH & SAFETY INFORMATION & TRAINING

16 COMPETENCE

17 MONITORING

18 WORKPLACE INSPECTIONS

18a WORKPLACE INSPECTIONS – TRAINING TEAM

19 POLICY REVIEW

20 RESOURCES FOR HEALTH & SAFETY

21 RECORD KEEPING

22 AUDIT

23 SAFEGUARDING LEARNERS AT RISK

The Policy

The Health and Safety at Work etc, Act 1974 imposes statutory duties on both employers and employees. To enable these duties to be carried out it is the policy of the Company, so far as is reasonably practical, to ensure that the responsibilities for health and safety are properly assigned, accepted and fulfilled at all levels of the Company. That all practicable steps are taken to safeguard the Health, Safety and Welfare of all learners, employees, customers, sub contractors, and any other person affected by the Company's undertakings.

The policy is divided into the following Sections:

Section 1: A general statement of intent with regard to health and safety;

Section 2: A statement of organisation, outlining individual(s) and general responsibilities;

Section 3: A statement of arrangements outlining the need for managers to be aware of relevant legislation and how to manage health & safety effectively and efficiently. All employees need to be able to work in a safe and healthy manner; ensuring staff have the skills, knowledge and attitudes to make them competent in the health & safety aspects of their work.

SECTION 1 - A general statement of intent with regard to health and safety

This document is a statement of the KHK People Development Ltd's policy and commitment to the health and safety of its employees at work, and ensuring that all learning takes place within a safe, healthy and supportive environment and is in accordance with the Health and Safety at Work etc. Act 1974 and all applicable regulations under the Act. The policy is extended to include the safeguarding and obligations placed upon the learners and other stakeholders. KHK People Development Ltd Training recognises fully the benefits, financial and otherwise, of providing a healthy, safe environment for all its stakeholders.

SECTION 2 - A statement of organisation; outlining individual(s) and general responsibilities.

The Organisational Arrangements in Place for Implementing the Policy Introduction

The ultimate responsibility for health and safety in the Company rests with the Company Executive Directors as the employer. This section details the organisation and designated authorities for all health and safety within the Company.

Company Executive Directors

All company Executive Directors will ensure that there is an effective and enforceable policy for the provision of health and safety throughout the Company in accordance with all relevant legislation, regulations and codes of practice.

All company Executive Directors will ensure that appropriate organisational arrangements relating to management of health and safety exists and are monitored and reviewed. In addition, they will ensure that sufficient resources are

earmarked within the Company budget to allow for effective implementation of the health and safety policy and all associated working practices.

All company Executive Directors will ensure that at all times that any risks that may affect the Safe Learner are identified and addressed.

Health and Safety Advisor

The Health & Safety Advisor is the appointed advisor for all health and safety issues. The Health and Safety Advisor reports to the Company Directors on health, safety and welfare matters. The Health and Safety Advisor is Karen Hope, Managing Director. Karen coordinates the risk assessment strategy that the Company has adopted. The evidence gathered from risk assessments carried out is fed back to the persons carrying out the task. The assessments are reviewed regularly and updated as new tasks/procedures are introduced, and also following any accidents/incidents. Karen Hope is qualified to carry out health and safety advice and guidance to IOSH and ENTO.

The duties relating to health and safety include:

- To establish and implement an effective health and safety management systems.
- To raise the awareness and profile of health and safety across the Company.
- To implement and monitor procedures to ensure good health and safety standards are maintained.
- To monitor compliance by sub-contractors or hirers of Company premises within Company health and safety requirements.
- To monitor fire prevention and general fire safety.
- To ensure that wilful breaches of the health and safety regulations by anyone using Company premises, be they staff, learners or visitors, are reported to senior management.
- To monitor risk assessments, safe systems of work and methods of work, maintenance.
- To monitor and ensure that arrangements exist for emergency procedures covering fire, explosion and accidents/incidents/near misses.
- To deliver staff development and staff induction sessions on health and safety matters.
- To monitor Company first aid arrangements.
- To implement and maintain health and safety inspections using both internal and external resources where appropriate.
- To provide specialist health and safety advice across the Company as required and ensure that designated safety representatives are aware of key issues that affect their designated areas.
- To seek specialist advice as required and endeavour to reflect accepted best practice within the Company health and safety procedures.
- To ensure the systematic reporting of health and safety matters under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 and assist where appropriate, with investigation of accidents/incidents at work, near misses and the complaints originating from designated site safety representatives.
- To review health and safety regulations and assist with the implementation and monitoring of specific health and safety objectives.

General Duties of Employees at Work (All Members of Staff)

It shall be the duty of every employee while at work:

- a) To take reasonable care for the health and safety of himself and of other persons who may be affected by his acts or omissions at work; and
- b) As regards any duty or requirement imposed on his employer or any other person by or under any of the relevant statutory provisions, to co-operate with him so far as is necessary to enable that duty or requirement to be performed or complied with;
- c) Not to interfere with or misuse things provided pursuant to certain provisions;
- d) No person shall intentionally or recklessly interfere with or misuse anything provided in the interest of health, safety or welfare in pursuance of any of the relevant statutory provisions.

As regards any duty or requirements imposed by the Company under any relevant statutory provision, the individual member of staff must cooperate so far as necessary to enable that duty or requirement to be performed or complied with.

In particular, all members of staff must:

- Be familiar with the Company Health and Safety Policy and working practices;
- Ensure that learners are informed of health and safety regulations, rules and procedures and that learners and other staff in their area of work apply these effectively;

- Ensure that toxic, hazardous and highly flammable substances are correctly used;
- Report immediately to their Line Manager, any defects in the premises, equipment and facilities, which they observe and, take an active part in promoting health and safety;
- Ensure that all learners that they are responsible for, receive an adequate health and safety induction, which must include the following as a minimum:
 - Emergency arrangements (fire, accidents and first aid)
 - Any significant risks that may affect them (for example, machinery and equipment, manual handling, hazardous substances, slips, trips and falls)
 - Control measures for the above (for example, safe systems of work, supervision, protective and preventative measures, training and instruction, signs and notices)
 - Supervision arrangements (and who is responsible for them) and the contract (if not the supervisor or instructor) for any health and safety concerns
 - Any restrictions or prohibitions that apply to the learners (for example, equipment, processes, areas, systems)
 - Any personal protective equipment or clothing that they must wear, why this is so, and when and how they should wear it
 - Location of welfare facilities (toilets, drinking water etc.) General “do’s” and “don’ts”

This may be in addition to the general company health and safety induction, particularly when learners will be working in workshops, or in external premises where they will need a more specific induction to the work area.

- Ensure that any visitors to the site that they are responsible for, are adequately supervised and receive a health and safety induction (where necessary)

Learners

It is the responsibility of each individual learner to take reasonable care of his or her own health and safety and not to act in a manner that places others in danger.

In particular, all learners must:

- Prior to starting any course attend a safety induction with their Assessor/Tutor
- Be familiar and comply with, fire and emergency evacuation procedures;
- Use plant, machinery and equipment only when authorised to do so and in accordance with instructions;
- Use the correct equipment and tools for the job and any protective clothing and safety equipment required in a proper manner;
- Report immediately to their tutor, any defects in the premises, plant, equipment and first aid facilities which they observe and
- Report immediately to a member of staff, any accidents, incidents or near misses;
- Take an active interest in health and safety.
- Individual specific risk assessments must be carried out for any learner under the age of eighteen

We view young people as being particularly vulnerable in the workplace because of their inexperience and immaturity, and will take the regulations into account when assessing the Health and Safety risks they are exposed to. They recognise that trainees over 18 years of age are also ‘at risk’ and the general ethos of the policy and relevant procedures is that all learners are subject to these regulations as appropriate, irrespective of age.

The Management of Health and Safety at Work Regulations 1999 previously required the Management to carry out a ‘suitable and sufficient’ assessment of the risks to which employees were exposed whilst at work. Where young people are involved there are now additional requirements in the following three paragraphs.

Specific risk assessments

We will ensure that an appropriate risk assessment specifically related to the young person is carried out before employing or engaging him or her in learning (or before a work placement starts). In the case of young people already at work in the company a risk assessment will be conducted immediately.

The risk assessment will consider:

- The immaturity and inexperience of the young person and any consequential lack of awareness of risks
- The Health and Safety training to be given
- The extent of exposure to any chemical, biological or physical agents
- The nature and layout of the work area
- The types of equipment, methods of use and work activities to be undertaken

Reduction of risks

The Management will ensure that young people are not exposed to risks at work that arise because of their lack of maturity or experience and any consequential lack of awareness of dangerous or potentially dangerous situations. A young person will not be expected to do any of the following:

- Work beyond their physical or psychological capabilities
- Work involving harmful exposure to radiation
- Work involving risks to health from noise, vibration or extreme heat/cold
- Work involving harmful exposure to any agents which can chronically affect health, including those toxic or carcinogenic effects or those causing genetic damage or harm to an unborn child

Pre-existing requirements

In addition to MHSWR, the provisions of the Health and Safety at Work Act 1974 were extended to cover trainees on 'relevant training schemes' (various government funded schemes). KHK People Development Ltd Training recognise that they have an established duty of care in their capacity as employer or training agent.

Practical applications

We will ensure that young people on 'relevant training schemes' are supervised at all times. In cases where learners are required to attend training or work experience at other locations, a Health and Safety Vetting Checklist will be completed and assessed by the company. The checklist will be completed prior to any 'training' activity off company premises. In order to ensure good practice and consistency in approach, the checklist and management of the Health and Safety for trainees will apply equally of trainees over the age of eighteen years.

Vulnerable Adults and New/Expectant Mothers

We will ensure that vulnerable adults and new/expectant mothers are not exposed to risks at work. A full Policy has been integrated into the Health & Safety Policy with regard to Safeguarding Learners at Risk and can be found in Section 23 at the end of this policy.

New/Expectant Mothers

The company will take into account particular risks to new and expectant mothers (i.e. someone who is pregnant, has given birth within the previous six months or is breast feeding). Specific risk assessments will be carried out to identify any hazards, which could pose a health, and safety risk, with appropriate action taken to remove or control the risk. All female staff will be notified of health and safety information, which relates to new/expectant mothers.

Visitors

It is the responsibility of all visitors to take reasonable care of his/her own health and safety and not to act in a manner that places others in danger.

In particular, visitors:

- Must comply with instructions given by members of staff;
- Must not tamper with emergency equipment;
- Must bring to the attention of staff any health and safety issues;
- Must wear protective clothing where indicated.

SECTION 3 - Statement of Arrangements

1 Safety Management System

The ultimate goal of the safety management system is to prevent injury and ill health in the workplace and during any associated activities. Adequate workplace precautions are to be provided and maintained to prevent harm to people at the point of risk. Workplace precautions are to match hazards and risks at each stage of the Company's activities.

Risk control systems (RCS) are to be used to ensure that adequate workplace precautions are provided and maintained. RCS's which are appropriate to the hazard must be sufficient to cover all hazards, the design, reliability and complexity of each RCS needs to be proportionate to the particular hazards and risk.

The following Safety Management System model HS (G) 65 is to be adopted.

- Plan
- Do
- Check
- Act

Workplace precautions are to be adopted as necessary, to include, safety instructions, method statements and safe systems of work.

2 Risk Assessments

Managers must ensure that risk assessments are carried out in line with the Risk Assessment Policy. Only a competent person who has had sufficient training and experience or knowledge and other qualities to enable proper risk assessment and resultant control measures will carry out risk assessments.

No member of staff/learner will attend a work placement prior to a full risk assessment being carried out to identify potential hazards and ensure that a safe working environment is in place.

Risk assessments are required under the Management of Health and Safety at Work Regulations 1999. Risk assessments are undertaken to identify the risks to the health and safety of staff, learners, visitors and contractors for the purpose of identifying the measures that need to be taken to comply with health and safety requirements.

2.1 General

There is a general requirement to carry out risk assessment under Management of Health & Safety at Work Regulations 1999.

Managers shall make a suitable and sufficient assessment of the risks to the health and safety of staff and the risks to the health and safety of learners/persons affected by the activities within their designated work environment; for the purpose of identifying the measures needed to take to comply with the requirements and prohibitions imposed under the relevant statutory provisions.

These assessments are to be reviewed annually unless specific review periods are identified, if there has been significant change in the matters to which it relates or there is reason to suspect that it is no longer valid.

Principles of prevention are to be applied with every appropriate preventive and protective measure taken, having regard to the nature of the activities and the size of the undertaking. Effective planning, organisation, control, monitoring and review of the preventive and protective measures should be identified. These are to be formally recorded on the Company Risk Assessment forms and where necessary, advice is to be sought from the Health & Safety Advisor as necessary.

Health surveillance is to be provided as is appropriate having regard to the risks which are identified by the risk assessment process.

2.2 Control of Substances Hazardous to Health (COSHH)

The Company has a duty under the Control of Substances Hazardous to Health Regulations (COSHH) to ensure that members of staff and learners are not exposed to substances hazardous to health. The COSHH regulations require a risk assessment to be carried out of the hazards associated with substances used in the course of work in regard to the correct and safe storage, use and supervision.

Managers should ensure that a COSHH assessment is carried out for each hazardous product used within their area of responsibility. A copy of the assessment should be sent to the Health and Safety Advisor to keep on a central file. Control measures identified in the assessments must be rigorously adhered to.

Any member of staff considering buying hazardous substances for use in the Company by staff or learners should request from the supplier/manufacturer a copy of the safety data sheet for that product, which will give clear guidelines on handling, storage, spillage and protective clothing required prior to purchase. The COSHH summary sheet must be displayed near to where the substance is used and stored. Where there is the intention to purchase a new product COSHH assessment must be carried out before the product is purchased. Where possible, any hazardous substances should be replaced by those that are non-hazardous, or less hazardous.

All learners using the substance should be given clear instructions by their lecturer before use and must be supervised at all times. Training will be given to any member of staff who may be exposed to a hazardous substance while carrying out their duties. They will be made aware of the information stated in the COSHH assessment and on the data sheets provided. Training should take place as part of an induction programme and be monitored and updated regularly.

2.3 Display Screen Equipment

To comply with the Health and Safety (Display Screen Equipment) Regulations 1992, an assessment of all workstations will be carried out to assess compliance with the regulations. Managers in consultation with the Display Screen Assessors are responsible for ensuring these assessments are carried out. Users will be given the opportunity to request an appropriate eye and eyesight test. This can be requested yearly through the Directors. The Company will meet the cost of the tests and any corrective appliances should they be required specifically for use with display screen equipment.

Display Screen Assessors will be given specific training. Managers will give members of staff adequate training in the use of workstations. Users will be given information and be kept up-to-date with legislation and best practice.

3 Safe Systems of Work/Workplace Precautions

Managers are to ensure and monitor the provision of systems of work/workplace precautions so that they are, so far as is reasonably practicable, safe and without risk to health. Safe systems of work/workplace precautions should consider the human factors based on that most of our end users are learners and young persons, curriculum design, quality and health & safety should be integrated, staff involvement should encourage solutions which are relevant and practical for ease of implementation.

4 Work Equipment Definition

Work equipment is defined as any machinery, appliance, apparatus, tool or installation for use at work (whether exclusively or not). Work equipment should be suitable for its intended use.

Conformity

New equipment purchased shall comply with the Provision and Use of Work Equipment Regulations 1998. It will be CE marked and have a declaration of conformity. All portable electrical work equipment will be tested for safety of use prior to being used.

Risk Assessment

Managers must ensure competent persons carry out risk assessment on new equipment before introduction to the workplace. Existing equipment must be risk assessed as required by manufacturers' guidance or as deemed necessary by managers.

All members of staff have a responsibility to ensure that work equipment used by them is kept in efficient working order, in good repair and report any faults that they identify. If that fault is likely to cause injury, the staff member is required to cease its use as soon as would be safe, isolate it away from the area of operation, and report to their Manager.

Information and Training

Line Managers shall ensure that all persons who use work equipment have received adequate training for purposes of health and safety, including training in the safe methods, which may be adopted when using the work equipment, any risks that such use may entail, and precautions to be taken.

Line Managers shall ensure that any of their employees who supervises or manages the use of work equipment has received adequate training for purposes of health and safety, including training in the safe methods, which may be adopted when using the work equipment, any risks that such use may entail, and precautions to be taken.

5 Personal Protective Equipment (PPE)

Managers through risk assessments will identify the need for PPE. The provision of PPE should be fit for purpose. The user shall ensure that PPE is maintained and kept in good working order; replacements and cleaning are in line with manufacturer recommendations.

Staff and learners will be provided with PPE when their exposure to risks cannot be adequately controlled by other means. Where PPE is provided, the trainer, as part of their training shall give learners information and instruction on the use of PPE.

6 First Aid

The Health & Safety Advisor is the designated First Aid Coordinator. The responsibility is to ensure that, where relevant, the Company follows the Health and Safety (First Aid) Regulations 1981.

The main duties of the First Aid Coordinator are to:

- Coordinate the training of personnel to the required standards;
- Coordinate trained first aiders and appointed persons to ensure there is first aid cover to the required level while the Company is open;
- Ensure the Company's first aid boxes are maintained and that there is an adequate stock of consumables. In addition, ensure that suitable first aid facilities (eye baths, showers etc.) are suitable located within areas that require them;
- Ensure that first aiders' certificates are kept up-to-date and that the Company has the requisite number of trained personnel to fulfil its obligations;

7 Fire Precautions and Evacuation Procedures

It is the responsibility of the H&S Advisor to ensure that KHK People Development Ltd complies fully with the fire evacuation procedure.

All members of staff and learners will be made aware of the fire evacuation procedures on their entry into the Company as part of their induction programme. All visitors who have mobility difficulties must be made aware of the designated 'refuge points' within their close proximity.

Any staff-visiting learners on external sites must make themselves aware of the evacuation procedures.

Fire evacuation notices are placed in all rooms giving clear instructions on what to do in case of a fire.

Fire assembly point notices are placed in prominent positions to assist with the location of fire assembly points.

Each site will have designated safe havens for visitors who have mobility difficulties, the locations of which are agreed with the H&S Advisor. Visitors within this category will be instructed to make their way to the safe haven where a designated fire evacuation staff member will escort them to the designated fire assembly point. All refuge points to be kept clear and unobstructed.

7.1 Evacuation Procedure

All staff, learners, visitors and contractors are to follow the emergency instructions posted.

Any visitors/contractors working on any company premises are the responsibility of the member of staff who invited them and in the event of evacuation the Office Manager to be informed so they can be accounted for.

KHK People Development Ltd Training evacuation procedures work on a *clear building* system; this is due to the amount of movement throughout the Company on a daily basis making a role call system unable to guarantee that each building is clear of all persons and that the building is shared with other companies. To ensure buildings are clear, fire coordinators and office staff will attempt to identify room by room that all areas are clear, if refuge areas are brought into use then numbers of persons in refuge areas needs to be reported to the fire building manager/senior member of staff immediately for transmission to the Fire Brigade.

7.2 Fire Alarms

The Office Manager is responsible for calling fire alarm tests and fire drills to a timetable agreed. The Office Manager is also responsible for calling the fire brigade should a fire break out. Any faults identified must be reported to the respective fire alarm system provider. When a fire alarm sounds it is the responsibility of the building fire coordinator to evacuate all personnel from the building. Fire marshals are responsible for carrying out weekly checks on fire exits, signs, extinguishers, lighting and doors.

7.3 Emergency Lighting

The Company's mechanical and electrical contractor carries out regular maintenance checks to the emergency lighting systems in all the Company's building to ensure their operation.

7.4 Training

The H&S Advisor coordinates fire extinguisher training for the designated fire evacuation personnel and other members of staff on a regular basis.

8 Manual Handling

Where staff carry out manual handling operations, an assessment will be carried out in accordance with the Manual Handling Operations Regulations 1992.

Where it is found that a manual handling operation cannot be avoided an assessment will be made and appropriate control measures introduced. The moving of loads over 25kg by a single operator not using a mechanical aid should be avoided.

Where a risk assessment identifies personal training as a control measure then this will be organised by Professional Development.

9 Mechanical and Electrical Safety

Electrical equipment shall be: safe and constructed in accordance with principles generally accepted as good engineering practice in relation to safety matters and in particular shall be designed and constructed to ensure that it is safe when connected to the electricity supply system by providing a level of protection against electric shock and installed in accordance with IEE regulations and the Electricity at Work Regulations 1989.

Only authorised, competent persons shall carry out work on mechanical and electrical systems, or any piece of electrically powered equipment. All staff should visually inspect their work equipment before use and should report

any faults promptly. Any faulty piece of equipment should be taken out of service, labelled as out of service and, if possible, unplugged from the supply.

Fixed electrical and mechanical equipment will be maintained by qualified engineers through the Estates department.

Staff who work with electrical and mechanical systems are required to participate in training, when provided, to ensure that they understand how to work safely with equipment and electrical systems, and are to work within the guidelines provided.

9.1 Portable Appliance Testing

Portable (plugged in) appliances shall be subject to inspection and testing in accordance with the Company's working practice on portable appliance testing. The Manager will monitor the scheme of testing and holds all relevant documentation.

No portable electrical equipment brought onto Company grounds shall be used without an authorised PAT test certificate.

Visiting speakers are to ensure that all non-Company portable appliances must have a valid PAT certificate prior to the equipment being used on Company property.

10 Work Related Ill Health

All staff requiring health surveillance as defined under COSHH and Management Regulations will be referred to an occupational health advisor.

All staff whose medical condition changes from the original health screening process should consult the Human Resources Policy and follow the recommended instructions references the reporting of changes to the individual's state of health.

11 Reporting of Accidents and Incidents and Near Misses

It is the duty of every member of staff to report any accident (or near miss), however slight, using the Company accident report form, which must be submitted to the health and safety advisor within 2 days of the accident occurring.

The Health and Safety Advisor is responsible for ensuring that all accidents/incidents reportable under the Reporting of Injuries, Diseases, and Dangerous Occurrences Regulations 2013 are reported to the enforcing authority. The Directors and the Health and Safety Advisor must be informed immediately of any serious accident or dangerous occurrence (e.g. an accident resulting in a person being taken to hospital).

12 Communication and reporting

The company will use formal methods of communication, which will include various written and electrical forms, as well as through specific training and work groups. Legal developments, technical developments and developments in health & safety practice, (where applicable) will be delivered to all appropriate by means of the Company health and safety notice boards.

Managers are to communicate the significance and importance of health & safety issues and objectives to maintain the safety culture. This policy will reflect the statement of intent, the organisation for health & safety and the arrangements for health & safety. Documented performance standards, risk control H&S information and significant findings from risk assessments are to be made available at the workplace.

Reporting of health & safety issues are to be through the line-management system or, where it is deemed there is a possibility of imminent danger, the activity is to cease and Health & Safety Advisor is to be contacted immediately.

Health and safety issues and proactive directives shall be implemented after direct consultation with employees/learners.

13 Contractors and Sub-Contractors

All contractors and sub-contractors will be directly responsible to the Manager, who has overall responsibility for the implementation and operation of the Company's Health and Safety Policy as regards to contractors. Method Statements and risk assessments by the Contractors are to be supplied on request to ensure safe systems of work.

Any redress against the contractor/sub-contractor must be made in accordance with the conditions accepted in the formal contract documentation.

All contractors are to give the Centre Manager sufficient notice prior to commencement of any works, including work force names, times, vehicle registration numbers and duration of work are also to be forwarded to estates admin for approval.

All contract staff are to be easily identifiable by work logos or badges and are to be aware of the additional precautions when working around young persons or children.

14 Visitors

The Company will ensure the safety of all non-employees while on Company premises by:-

- a) Displaying adequate and suitable warning signs identifying hazards.
- b) Prohibiting and restricting entrance to high risk areas.
- c) Providing sufficient information and control including 'Work Permits' and/or accompaniment for persons in areas where specific risks exist.

It is the responsibility of the office representative who invited the visitor to site to ensure that he/she acts in a safe and appropriate manner.

Where appropriate the visitor should be accompanied by an office representative who can personally ensure that the visitor conducts himself/herself properly, and that the appropriate action is taken should a safety situation arise.

If the visitor is to be on the site unaccompanied, the Office Manager must ensure that the following actions have been taken and where necessary confirm this in writing to the visitor:

- a) Actions in the event of a fire and/or fire alarm are explained and a safe route has been agreed.
- b) The visitor has been instructed to obey the safety signs, barriers and prohibition notices etc.
- c) The visitor has been instructed to report back to the office representative **before** leaving site.
- d) Any other safety issues are raised

15 Staff Health & Safety Information & Training

All staff will carry out an induction and are to attend the mandatory Safety at Work course. Safety awareness/refresher courses will be arranged (as required). Health and Safety posters are displayed appropriately throughout the Company and a variety of safety information leaflets are distributed on a regular basis to members of staff. All staff likely to face specific risks will be identified by risk assessment and will have access to the risk/DSE/COSHH/visit assessment.

Learners are made aware of health and safety matters as part of their induction programme. Where appropriate, health and safety matters are integrated within their course syllabus.

A copy of the Company Health and Safety Policy Statement together with Codes of Practice is provided for each member of staff in accordance with the Health and Safety at Work etc. Act 1974. Various aspects of the policy are drawn to the attention of staff on a regular basis through the Company email system and communicator.

16 Competence

To ensure maximum contribution to health and safety from all employees, the Company will endeavour to ensure that staff are competent in the roles allocated using applied knowledge, skills and adequate supervision.

It is the responsibility of the Management to ensure staff are competent to carry out the roles and responsibilities of any given task. Specialist tasks that require the assistance of specialists should be sought and resourced within the framework of the health and safety programme.

17 Monitoring

The monitoring of health and safety performance against the strategic plan is a management responsibility; the Company commitment to health and safety objectives, performance and a positive health and safety culture is fundamental in guaranteeing that risks are effectively controlled.

The Company safety management system uses two types of monitoring:

- **Active**, to monitor the design, development, installation and operation of management arrangements, risk control systems and workplace precautions.
- **Reactive**, to monitor accidents, ill health, incidents, near misses, trends and safety performance.

KHK People Development Ltd's Executive Directors will receive a quarterly report from the Company Health and Safety Advisor. The report will detail work completed in relation to the Health and Safety strategic plan, and reported

incidents and accidents in the period under review and changes in the legislative framework insofar as their affect on the Company. It is the responsibility of the Directors to monitor this report.

The Company Management Team received quarterly updates on health and safety matters from the Health and Safety Advisor. It is their collective responsibility to act immediately on urgent matters of safety as and when they arise. In addition the Health and Safety report prior will be assessed for comment and further recommendations made if necessary.

Management meetings will be held to discuss health and safety matters, minutes of the meeting will be distributed and placed on the safety notice board.

Where necessary, it is the responsibility of the manager to take appropriate action against individuals or groups who breach the Company Health and Safety Policy. The responsibility for reporting breaches of Health & Safety Regulations lies with all staff. Disciplinary for breaches for Health and Safety Regulations will be dealt with in the Disciplinary and Grievance Policy.

Tutors will be responsible for monitoring the safety of their learners this will be recorded and placed on the learners file any concerns will be initially reported to their Manager who will action these concerns.

The Manager and the Health and Safety Advisor will investigate all serious incidents or near misses, and the performance of individuals and/or groups measured against the extent of their compliance with the Company Policy.

18 Workplace Inspection

The Company system for inspecting workplace precautions/safe systems of work is part of the active monitoring plan; this is to take into account annual general safety inspections by the Health and Safety Advisor and monthly inspections by Managers in house and Tutors for external working environments. There is a Company workplace inspection checklist, which is to be modified for individual areas. For more detailed information.

Managers are to carry out inspections, initiate remedial actions and prioritise deficiencies in order of importance. Action plans with deadlines and persons responsible are to be used to track progress on implementation/improvements.

Other losses, such as damage to property or Company equipment, incidents and anything with the potential to cause harm, weakness or omission including lack of supervision is also to be considered.

Managers must encourage open, honest communication, and avoid the advocacy of a blame culture.

The person responsible for carrying out the workplace checks is Karen Hope, Managing Director, qualified to IOH and ENTO.

18a Workplace Inspections – Training Team

KHK arrange or fill apprentice vacancies. This includes third party sub-contractors and also includes those who are only involved in organising the off the job training element of the apprenticeship.

The employer has the primary responsibility for the health and safety of the apprentice and should be managing any significant risks. KHK, will take reasonable steps to satisfy that the employer is doing this via an H&S check before the learner starts or any training takes place on site.

You can rely on past experience, for example, if the employer is familiar to you and they have a good track record on health and safety. You should keep checks in proportion to the environment:

- For low risk environments, such as an office or shop, with everyday risks that will mostly be familiar to the apprentice, simply speaking with the employer to confirm this should be enough. This can be part of any wider conversation on placement arrangements that may take place.
- For environments with less familiar risks, like light assembly or packing facilities, talk to the employer to find out what the apprentice will be doing and confirm the employer has arrangements for managing risks,

including induction, training, supervision, site familiarisation, and any protective equipment that might be needed.

- For higher risk environments such as construction, agriculture or manufacturing, discuss with the employer what the apprentice will be doing, the risks involved and how these are managed, satisfying yourself that the instruction, training and supervisory arrangements have been properly thought through.

Check the apprentice knows how to raise any health and safety concerns.

19 Policy Review

It is the responsibility of the Company management in general to ensure that the policy is being effectively pursued and that satisfactory standards of safety performance are being achieved.

The Health and Safety policy will be reviewed on an annual basis; this review will be carried out by the H&S Advisor in consultation with the Directors. The next will be conducted in September then every September in following years.

20 Resources for Health & Safety

The Company will provide appropriate funding to meet the legal requirements of health and safety. All company Executive Directors are responsible for approving a capital budget for safety items, which fall outside of the health and safety revenue.

21 Record Keeping

All records relevant to health and safety matters are to be kept centrally by the Health and Safety Advisor. Records are maintained and monitored according to Health and Safety Legislation and Codes of Practice.

22 Audit

Internal safety audits will be carried out by the Health and Safety Advisor and Office Manager, and other management personnel (as appropriate). Monitoring of individual areas will take place once a year; these are to follow the inspection format, but are to establish that:-

- Appropriate management arrangements are in place;
- Adequate risk control systems exist, are implemented and are consistent with the hazards and risks identified;
- Appropriate workplace precautions are in place.

The concept of this audit system is to be seen as a valuable contribution to health and safety management system not as a faultfinding exercise. This audit should identify positive achievements as well as areas for improvement.

23 Safeguarding Learners at Risk Policy

Safeguarding Learners at Risk Policy

Rationale

KHK People Development Ltd Training is committed to providing a safe and supportive learning environment that promotes well being and security for all learners and staff. Through this policy KHK People Development Ltd Training also recognises its particular contribution to safeguarding “learners at risk” and protecting them from abuse.

The Policy informs KHK People Development Ltd Training staff and management of their responsibilities towards safeguarding learners. The full policy and procedures are available to learners and members of the public.

2. Definitions

“Learners at risk” replaces the previously used concept of vulnerable learners.

The learner at risk may have a physical impairment, a sensory loss, or a learning disability, perhaps present from birth or due to advancing age, chronic illness or injury. He or she might self-harm, be dependent upon or misuse substances such as alcohol or drugs, or experience physical or mental ill-health.

Abuse – the misuse of power by one person over another has a large impact on the person’s independence.

Neglect – can prevent a person, who is dependent on others for their basic needs, from exercising choice and control over the fundamental aspects of their life and can cause humiliation and loss of dignity.

Abuse:

- Is a violation of an individual’s human and civil rights

- May consist of single or repeated acts.
- May be deliberate or unintentional.
- May cause harm temporarily or over a period of time.
- Can occur when there is an imbalance of power or control.

People who abuse:

- Are often well known to their victims but can be strangers.
- Might be a relative, partner, friend or neighbour, a paid or voluntary care worker, or a health or social care worker.
- Could be another vulnerable learner or service user.
- May not realise they are abusing and can sometimes act out of character and abuse because of the stress of caring.

Types of abuse

Abuse of a person often includes behaviour that is abusive in one or more of the categories described below. Many or all of these types of abuse may be the result of deliberate intent, negligence or ignorance.

- Psychological abuse
- Physical abuse
- Sexual abuse
- Financial and material abuse
- Neglect and acts of omission
- Discriminatory abuse
- Multiple or institutional abuse
- Domestic violence
- Forced marriage

3. KHK People Development Ltd Training aims to:

Safeguard learners by:

- Ensuring adequate CRB checks for all staff that may interface with learners
- Raising awareness of safeguarding issues amongst learners and staff.
- Ensuring a robust approach to the safe recruitment of staff that incorporates current guidance and legislation.
- Having effective arrangements in place to promote and maintain a safe learning environment.
- Ensuring that learners at risk know how to gain information on safety from abuse and violence, and know that there are staff they can approach to talk about any concerns.
- Implementing procedures to identify and report cases, or suspected cases of abuse, which reflect accepted guidelines.
- Providing information and training for staff on safeguarding and working with learners at risk.
- Ensuring arrangements are in place to monitor and review safeguarding issues and procedures.

4. Principles

To work co-operatively on the identification, investigation, treatment and prevention of abuse of vulnerable learners. To maintain equal opportunities by ensuring that:

- Equality and opportunity will be available to all learners at risk, regardless of their identity or personal circumstances (avoiding discrimination on the grounds of race, religion, ethnicity, age, gender, sexual orientation, disability or language).
- KHK People Development Ltd Training communication and responses are appropriate to the level of understanding and cultural background of those concerned
- To endorse the joint agency procedures on safeguarding learners.

5. Entitlements

Learners have the right to access training provided by KHK People Development Ltd Training; be free from fear of harm and to be protected from mistreatment and abuse. In addition, learners at risk should be able to access learning with as much independence as is appropriate and within their capabilities to make choices, even if those choices involve a degree of risk. All complaints, allegations or suspicions will be taken seriously and dealt with before any steps are taken. Where action is necessary, this will be undertaken with due regard to the KHK People Development Ltd Training Safeguarding Learners at Risk Policy.

KHK People Development Ltd Training staff responsibilities

All KHK People Development Ltd Training staff have a responsibility to:

- Be aware of and implement the KHK People Development Ltd Training policy on Safeguarding Learners at Risk.
- Promote a safeguarding ethos; provide a secure and supportive environment for all learners, including “learners at risk”.
- Undertake staff development appropriate to their role.

a. Management responsibilities

KHK People Development Ltd Training Managers have a responsibility to:

- Embrace a whole KHK People Development Ltd Training approach to promoting and safeguarding the welfare of learners at risk.
- Ensure staff are aware of the policy and procedures and that they receive appropriate training and support to undertake their roles effectively.
- Ensure this policy is implemented within their areas, centres.

b. Designated Staff responsibilities

The Designated Staff responsible for safeguarding learners:

Managing Director, normally the first contact for safeguarding issues.

Designated Officer with lead responsibilities for safeguarding issues.

The Designated Staff are responsible for:

- Promoting a whole KHK People Development Ltd Training approach to safeguarding the welfare of learners at risk
- Advising on induction and staff development arrangements for KHK People Development Ltd Training staff
- Liaising with KHK People Development Ltd Training management, the local authority and other agencies in relation to policies, procedures and individuals.
- Gathering and reviewing information concerning cases of suspected abuse or allegations, making referrals to the relevant agencies.
- Contributing to strategy discussions as appropriate.
- Maintaining confidential records relating to safeguarding issues.
- Liaising with the Managing Director to inform him of any issues and on-going investigations.
- Reporting to the Board to ensure that the policy is updated and reviewed annually.

c. Responsibility for Implementing the Policy

The Managing Director:

Has overall responsibility for the implementation of this Policy across KHK People Development Ltd Training.

Has overall responsibility for liaison with the local authority or other agencies regarding allegations made against staff including any allegations concerning the Designated Officer.

d. Corporation Responsibility

The Board has responsibility for liaison with the local authority or other agencies regarding allegations made against the Managing Director.

The Managing Director reviews the policy and receives annual reports on safeguarding issues.

The Safeguarding Learners at Risk Policy will be subject to review April 2011 by the Group Managing Director - **Promoting equality and diversity –**

Procedures for Staff Responding to Allegations or Suspicions of Abuse

Learners may choose to share concerns with staff they feel they can trust and with whom they feel comfortable. Staff need to know how to respond sensitively and who to approach for advice. Whilst KHK People Development Ltd Training staff are not responsible for investigating abuse it is essential that any allegations or suspicions of abuse are acted upon and treated seriously. Concerns should be passed on immediately to the Designated Officer in KHK People Development Ltd Training so that appropriate action can be taken.

The following guidelines must be followed:

- Do not put yourself at risk, stay calm and reassure the person that he/she was right to tell you.
- Listen carefully, allow the person to recall significant events – they may not tell anyone again.
- Do not press for more details or ask leading questions. This may jeopardise future investigations.
- Do not promise confidentiality. Be honest. Explain who you need to pass the information to and why (i.e. the Designated Officer in KHK People Development Ltd Training who can follow up and seek further advice). Only those who need to know will be told.

- Be aware that medical and criminal evidence may need to be preserved, so do not attempt to remove torn or soiled clothing and avoid touching or moving anything in the immediate environment.
- Do not talk to the alleged perpetrator(s) or pass on any information about the learner at risk. This is particularly important where “forced marriage” is concerned.
- Alerts to the Designated Officer should be made as soon as abuse or neglect is witnessed or suspected.
- It may sometimes be necessary to respond immediately to a situation to prevent further harm.
- In an emergency, if the learner at risk is in immediate danger, it may be necessary for the Designated Officer, the Managing Director or member of the Board to call the police and/or ambulance service. If this would cause delay and there is immediate risk of harm or need for treatment contacts with the appropriate emergency services should be made, indicating that a “vulnerable learner” is involved.
- Immediate protective actions should not incur irresponsible risk for the person identifying the concern.
- Forms for recording this information are available from the Designated Officer.
- As soon as practicably possible write down what you saw if you witnessed the abuse or what was said if the disclosure was made to you, including date, time and place where the alleged abuse happened.
- Use the exact words and phrases wherever possible.
- Note the setting and anyone there at the time- describe any significant points about the learner’s appearance, demeanour and mood and also the environment, eg furniture disturbed, or if any property was missing or damaged.
- Separate out factual information from your opinion; take care not to interpret responses.
- A body map can be used to illustrate any physical injuries.
- Use dark ink so your notes can be photocopied if required, sign and date everything you have written, pass notes to the Designated Staff.
- If the Designated Officer is not available advice should be sought from the Managing Director.

Procedures to address allegation of abuse made about staff

- In addressing allegations of abuse made about staff will seek to ensure compliance with the prevailing guidance from all appropriate bodies, United Kingdom employment legislation, laws of natural justice and its own internal procedures. These arrangements relate to all staff working at KHK People Development Ltd Training.
- The person to whom an allegation or concern is first reported should treat the matter seriously, keep an open mind and follow the guidance or responding to an allegation or suspicion of abuse.
- The concern should be reported immediately to the Designated Officer or in their absence to the Managing Director.
- The Designated Officer should contact Managing Director so that action is taken both to protect the learner and accused member of staff. This may involve:
 - An internal investigation and consideration of any action involving staff or learners.
 - Investigation of a possible criminal offence by the Police. If a crime is suspected KHK People Development Ltd Training will consult with the Police regarding their investigation, until such guidance is given, KHK People Development Ltd Training will suspend its investigation.
- Incidents of physical, sexual and financial abuse may all constitute potential criminal behaviour and must be treated as such until otherwise determined by the Police/Crime Prosecution Service.
- Where allegations relate to a member of staff, who also has contact with young people less than 18 years of age, the Managing Director will refer to the Local Authority Designated Officer for multi-agency discussion.
- Under the Sexual Offences Act a relationship between a member of staff and a learner, considered to be a “learner risk”, may constitute an “abuse of trust” particularly where there is a power imbalance and the learner does not have the capacity to consent.
- If necessary, Logistics and Manufacturing Recruitment will comply with guidance on making staff referrals to the Independent Safeguarding Authority.

Designated Staff

The Designated Staff responsible for safeguarding learners are:

Managing Director, normally the first contact for safeguarding issues. (Karen Hope)

Designated Officer with lead responsibilities for safeguarding issues. (Karen Hope)

Procedures for Designated Staff on receiving an alert of suspected or alleged abuse.

- a. On receipt of an alert of suspected or alleged abuse the Designated Staff member will:
 - Review the information given about the alleged abuse and any action taken by the alerter.
 - Gather as much additional information as possible from whichever necessary source to enable a decision to be made about whether or not the reported concerns constitute abuse.

- If appropriate, liaise with a relevant specialist Curriculum Leader/Co-ordinator within the School of Learning Support and Skills for Life.

b. Where the possibility of abuse cannot be ruled out, within one working day of receiving the alert the Designated Staff member will:

- Report this to Social Care Direct on 0845 8505010 or Police, as appropriate.
- Produce a verbal and subsequent written report, which includes precise factual details of the allegation, and where available the identity of the alerter (giving reasons to support decisions made).

c. If uncertain how to proceed and whether or not to refer a matter to Social Care Direct the Designated Staff member will, within one working day of receiving the alert :

- Request a formal pre-referral consultation and seek advice from a safeguarding worker (Learner and Community Services Standards and Development Team).
- Record the identified concerns and consultations relating to the allegation (a safeguarding referral or referral for social work involvement/assessment will be advised by the Team).

d. Continued involvements (providing the KHK People Development Ltd Training in not implicated in the allegation)

- A manager usually the Designated Staff member, who received the alert, will be involved in the strategy discussion/meeting and investigation processes.
- We will co-operate with any safeguarding investigations and will comply with recommendations identified as part of the learners post incident organisational/remedial pain.
- Where a vulnerable adult is required to undertake any tasks, a specific risk assessment will be carried out, taking into account any identified disabilities.