

HEALTH & SAFETY POLICY AND PROCEDURE

1) Statement

The Engineering Trust Training Ltd. (ETT) recognise that good standards of health, safety and welfare are an integral part of good management. The sensible and proportionate management of risk supports our work and the services we provide.

We aim to meet our health, safety and welfare commitments, so far as is reasonably practicable, by:

- a) Providing effective leadership and resources and access to competent advice across the organisation to enable agreed health, safety and welfare standards to be met;
- b) Clearly defining roles and responsibilities so that all stakeholders are clear of the contribution they will make to securing their own health, safety and welfare and that of others who may be affected by their acts or omissions;
- c) Achieving legal compliance, as a minimum, but striving for good or best practice where it is appropriate and proportionate to do so;
- d) Assessing the significant risks associated with our business activities and implementing sensible and proportionate control measures to reduce the risk of injury and ill-health and damage to property or the environment;
- e) Developing health, safety and welfare practices in consult employees, learners and employers;
- f) Embedding consideration of health, safety and welfare matters when planning and coordinating all business activities;
- g) Providing adequate information, instruction, training and supervision to our employees, learners, partner employers, delivery partners and sub-contractors to encourage ownership of health, safety and welfare matters and to enable each person to carry out their duties safely and to contribute to the overall delivery of the aims of this policy;
- h) Taking appropriate, timely and proportionate corrective and preventative actions to manage intolerable risks identified by monitoring, auditing and investigative activities.

We will review, and where necessary revise, our policy at suitable intervals (biennially or following any significant health and safety event or material change in organisation or arrangements) to ensure that it continues to reflect our commitment and stated aims.

Mark Vingoe
Chief Executive

2) Scope

- a) This policy applies to every aspect of ETT business.
- b) It describes ETT's commitment to discharge its duty of care to anyone potentially impacted by its undertaking
- c) It sets out the organisation roles and responsibilities of specified employees
- d) It sets out the arrangements in place to secure the health, safety and welfare of all people to whom it owes a duty of care.
- e) The policy also sets out the expectations on staff, learners, visitors, contractors, sub-contractors, service providers, suppliers, former staff, former learners and any other persons associated with the functions of the organisation in the support of ETT's efforts

to provide a safe and healthy workplace and to meet their own individual duty of care to others.

- f) This policy is supported by a range of other policies that may impose additional duties on specified employees in addition to those in this policy.

3) The Law

- a) Under health and safety law, the responsibility for managing work-related risk falls upon those who create that risk. This applies whether the risk maker is an employer, an employee, self-employed, an occupier of a premise, a designer or a manufacturer or supplier of articles or substances.
- b) For employers, this responsibility, or duty of care, extends to cover anyone who could foreseeably be harmed by any activities associated with the employer's undertaking. Whilst employers may delegate the performance of certain tasks to others, for example through the line management structure or by contracting out to third parties, the responsibility for ensuring that the duty of care has been met remains with them. Consequently, employers need to implement suitable governance arrangements to provide the necessary reassurance that delegated tasks, including those contracted out to third parties, have been carried out, and to take appropriate corrective action where this is found not to be the case. The extent of any monitoring should be proportionate to the degree of risk created.
- c) Health and safety law also imposes a duty of care on individuals to anyone who may be affected by their acts or omissions while carrying out their employer's undertaking. The extent of this duty will depend on the degree of control that the individual has over the way in which work tasks are performed.
- d) Undertaking
 - i) Case law has established that, in the context of health and safety law, "undertaking" has a very wide-meaning and includes not only core business activities and functions, but also any ancillary activities, such as the cleaning and maintenance and repair of buildings, plant or equipment associated with the employer's business regardless of who performs these activities.
- e) So far as is reasonably practicable
 - i) This principle is applied to the management of risks and whether a duty holder has done enough to meet their duty of care. Case law has defined this as being about weighing risk against the effort (time, expense, resources) needed to further reduce it. The law presumes that the balance of this judgement should be in favour of reducing the risk. It is only if the effort is grossly disproportionate to the risk that this standard can be deemed to have been met.
- f) Competence
 - i) There is no legal definition of competence. However, in a health and safety context this is generally understood to mean having the required skills, expertise, experience and training to carry out a required task safely.

4) Roles and Responsibilities

All defined organisation roles, responsibilities and accountabilities are subject to the caveat of "so far as is reasonably practicable".

- a) **The Board:** Governance for health and safety matters sits with the Board and directors of ETT and as such are responsible for:
 - i) Governing and monitoring ETT strategy and policy, including the overarching health and safety policy.
 - ii) Monitoring health and safety performance and seeking appropriate reassurance that health and safety performance is satisfactory.

- iii) Recommending and monitoring improvements where health and safety performance is found to be unsatisfactory.
- iv) The Board delegates management responsibility for health, safety and welfare matters to the Chief Executive.
- b) **Chief Executive:** Accountable to the Board for the implementation of ETT's health and safety policy and for monitoring health and safety performance.
 - i) Executive authority to set specific health and safety policy and for agreeing ETT performance standards for the management of health, safety and welfare matters.
 - ii) The Chief Executive delegate's responsibility for the delivery of specific aspects of day-to-day health and safety matters to the Director of Delivery and Operations and individual members of staff as described below.
- c) **Director of Delivery and Operations:** Accountable for the health and safety and welfare at work of all staff and for others whose health or safety may be affected, to any extent, by the work of ETT. To properly carry out this role, they will:
 - i) receive appropriate and recognised training to complete their role;
 - ii) have an appropriate awareness of the ETT health and safety policy, standards and guidance and the minimum requirements of legislation relating to ETTs work;
 - iii) have a broad understanding of the significant risks associated with the work carried out by ETT. Ensure that significant risks have been assessed, and that suitable and sufficient control measures are implemented. This task may be delegated to individual staff managers, but responsibility ultimately is with them;
 - iv) provide health, safety and welfare information describing the arrangements for securing the health, safety and welfare of staff, learners and anyone else potentially affected by ETTs work;
 - v) work with delivery partners to ensure their health, safety and welfare arrangements are adequate and get written confirmation of this;
 - vi) work with employer partners to ensure their health, safety and welfare arrangements are adequate and get written confirmation of this. This is also a statutory requirement;
 - vii) ensure that health, safety and workplace welfare issues, including any matters arising, are appropriately managed or resolved;
 - viii) consult staff on significant matters that may affect health, safety or welfare at work. This requirement will be satisfied by having a regular agenda item at staff meetings;
 - ix) carry out a health and safety inspection of ETT premises. Take remedial action to address any shortcomings;
 - x) make appropriate reports to the Chief Executive regarding ETTs health and safety performance and on their plans to address any identified concerns.
- d) **Training Officers & Lecturers:** Supervisory position responsible for learners and accountable for the health and safety of the people, activities, and programmes that they supervise. They must:
 - i) be aware of the health and safety issues, including any significant risks and control measures, relevant to their activities and those of their learners;
 - ii) It is the responsibility of the person supervising hazardous activities that are to be carried out by learners to ensure that a risk assessment has been carried out and suitable and sufficient control measures implemented before commencement of that activity.
 - iii) ensure activities in-company or at subcontracted provision i.e. Employers and/or delivery partners, are delivered with due care and measures have been taken to

account for the inexperience or other reasonably foreseeable vulnerabilities that the learner may have.

- e) **Administration Staff:** Each person is responsible for ensuring that they conduct their activities, and those activities over which they have control, in accordance with this health and safety policy and relevant statutory provisions. They must co-operate with the Operations Manager and Chief Executive so that health and safety responsibilities can be discharged. This responsibility cannot be delegated to others.
- f) **Learners when in-company:** This group are not considered ETT employees under health and safety legislation. As such, the requirements of the Health and Safety at Work Act will not normally apply to them in respect of ETT. They will fall under their employer's health and safety arrangements. However, Learners do come under ETT's duty of care and are required to comply at times with this policy. If they are at any point required to comply, then they will be notified of this via a relevant person.
- g) **Learners attending TESA:** Learners must fully comply with this policy and procedure. Each person is responsible for ensuring that they conduct their activities, and those activities over which they have control, in accordance with this health and safety policy and relevant statutory provisions. They must co-operate with the Director of Delivery and Operations and Chief Executive so that health and safety responsibilities can be discharged. This responsibility cannot be delegated to others.
- h) **ETT Partners & Subcontractors:** ETT has a legal duty to ensure its apprentices learn and work in a safe environment. Partner organisations will hold responsibilities, under the Health and Safety at Work Act, for the safety of apprentices and for the safety of anyone else who may be affected by their work. This includes a responsibility to cooperate with other duty holders to discharge that responsibility. As such, partner organisations are required to show evidence of relevant health and safety policy, standards and guidance whilst working under the contract with ETT. This must be a contractual requirement.

5) Procedure

The following specific aspects of this Policy are drawn to the attention of all employees.

- a) Risk Assessment
 - i) There are no fixed rules about how a risk assessment should be carried out; it will depend on the nature of the work or business and the types of hazards and risks.
 - ii) The risk assessment process needs to be practical and take account of the views of staff and any representatives who will have practical knowledge to contribute.
 - iii) The Director of Delivery and Operations is responsible for ensuring that arrangements for risk assessments are adequate.
 - iv) Appropriate risk assessments must be undertaken by a competent person, which identify hazards, decide who might be harmed and evaluate the risks, deciding on what control measures are necessary to minimise those risks, as far as practicable.
 - v) Risk assessments must be recorded, and any significant hazards communicated to relevant persons including the arrangements in place for controlling those risks.
 - vi) See full ETT Risk assessment policy and guidance.
- b) Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)
 - i) Accident book is located in the Office – all accidents and incident sustained whilst at work should be recorded.
 - ii) Certain incidents are reportable <https://www.hse.gov.uk/riddor/reportable-incidents.htm>
- c) Control of Substances Hazardous to Health (COSHH).

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<https://www.hse.gov.uk/nanotechnology/coshh.htm>
 - ii) Such substances (i.e. those marked irritant, corrosive, harmful, toxic, very toxic, or poison) will be found in cleaning products etc.
 - iii) The COSHH Regulations will require all employers to carry out assessments to prevent or, when this is not practicable, to adequately control exposure to those substances which are used in the workplace, and which will be hazardous to health.
 - iv) The Regulations specifically state that prevention of exposure, if reasonably practicable, should take precedence over control measures. If prevention is not reasonably practicable, adequate control will be necessary. The Regulations will require that controls other than personal protective equipment is used so far as is reasonably practicable.
 - v) Training Officers must abide by any COSHH regulations and/or control measures whilst on site at any partner organisation and take the necessary action to ensure compliance.
- d) First Aid Provision
- i) First Aid cover must be provided at the TESA throughout the working day.
 - ii) A fully stocked first aid kit is maintained at TESA.
 - iii) All injuries should be reported as directed above.
- e) Fire Safety
- i) All members of staff must be aware of the dangers and fully aware of escape routes and evacuation procedures.
 - ii) There are automatic sensing and warning devices at TESA.
 - iii) Alarms are tested periodically, and a record kept.
 - iv) There is a full range of fire extinguishers which are checked annually by a qualified engineer and inspection certificates are kept.
 - v) A fire drill is undertaken periodically.
 - vi) See full Fire Safety Policy.
- f) Electrical Equipment
- i) The fixed electrical installation will be inspected at 5 yearly intervals
 - ii) PAT testing is carried out for all portable electrical appliances every 2 years.
- g) Display Screen Equipment (DSE)
- i) Although work with DSE is not generally regarded as high risk, it can lead to muscular and certain other physical problems such as visual fatigue and mental stress.
 - ii) It should be noted that where these problems do occur, they can usually be overcome by good ergonomic design of equipment and furniture and by improved working environment and work content.
 - iii) An employee is regarded as a 'user' if he/she habitually uses such equipment as a significant part of their normal work.
 - iv) Users are encouraged to:
 - take periodic breaks from using DSE and where activities undertaken during these breaks do not involve broadly similar use of hands or arms;
 - takes a break before he/she becomes fatigued;
 - breaks should be part of working hours
 - short, frequent breaks are preferable to less frequent, longer breaks
- h) Personal Protective Equipment (PPE)
- i) PPE is required in certain areas at TESA. Signage will be placed to confirm what is required.

- ii) PPE is required for those within the business who visit partner employers where its use is mandatory.
 - iii) ETT will inform learners what PPE will be provided and what they may have to provide for themselves. Any issue meeting the cost of this should be raised with ETT.
 - iv) ETT will contribute to the purchase of this equipment as set out in the Staff Expenses Policy. The amount is enough to cover the full cost of the standard PPE equipment required. Staff are welcome to spend more however the contribution from ETT is fixed.
- i) Housekeeping
- i) ETT is responsibility for the maintenance of a safe and clean workplace.
 - ii) ETT will organise for certain areas of TESA to be cleaned on a weekly basis by a professional company. They will routinely remove waste and refuse to the central collection point.
 - iii) Staff must act proactively and are expected to maintain clean and tidy work areas and any difficulties encountered must be reported immediately to the Director of Delivery and Operations.
 - iv) Good training ensures that employees are competent to carry out their duties, thus reducing the risk to both health and safety.
 - v) All new staff will be trained in the use of equipment and procedures relevant to working in at TESA
 - vi) The Director of Delivery and Operations will receive specific Health and Safety training in order to be competent in their role as highlighted above.
- j) Lone workers
- i) Lone Workers can be classified as those who work in any situation or area without other persons nearby. As a guide if a person called for help and it could not be heard by another member of staff, then that person would be classed as a lone worker.
 - ii) The setting up of safe working arrangements for lone workers is no different to organising the safety of other staff. See the ETT Lone Worker Policy.