

Health and Safety Statement & Policy

Start Training Ltd is committed to pursuing excellence in everything it does and this includes the management of health and safety.

General principles

- 1. At START TRAINING LTD we are committed to giving health and safety the highest priority in all of our activities.
- 2. We expect staff, students, visitors, contractors and other employers who work with START TRAINING LTD to share this commitment by complying with our policies and, where appropriate, our procedures and to understand that they too have legal and moral obligations to themselves and to one another.
- 3. We are dedicated to ensuring the health and safety of all persons who may be affected by our activities by:
 - a. Providing, managing and maintaining a work environment, as well as off site facilities, which are, so far as reasonably practicable, safe and in which risks to health are controlled.
 - b. Providing adequate and appropriate facilities and arrangements for welfare at work.
 - c. Providing, managing and maintaining our workplaces, grounds and properties so that they are so far as reasonably practicable, safe and that risks to health are controlled.
 - d. Providing, managing and maintaining our workplaces, grounds and properties so that they are, so far as reasonably practicable, safe and that risks to health are controlled.
 - e. Ensuring that the use, handling, storage and transport of items and substances are carried out safely and that risks to health are controlled.
 - f. Implementing systems of work that are safe and where risks to health are controlled.
 - g. Providing the necessary organisation, expertise and resource, including communication and consultation, planning, monitoring, inspection and auditing procedures to ensure that there is effective management of health and safety throughout.
 - h. Ensuring that our staff and any contractors we employ are competent and carry out risk assessments for all the work they control.
 - i. Providing the information, instruction, training and supervision at all levels necessary to ensure that our staff and students are aware of the hazards at their workplace, together with the appropriate measures to be taken to protect against work hazards.
 - j. Giving adequate information on relevant hazards to any persons whose health and safety might be affected by them.
 - k. Monitoring the safety performance of contractors who work with us.
 - I. Keeping up to date with best practice in relation to health and safety and complying with all relevant legislation and authoritative guidance.
 - m. Consulting with and involving our staff and students in matters relating to their own health and safety.
- 4. Where there are no existing START TRAINING LTD policies or guidance, we expect our staff, students and contractors to meet the highest relevant standards and to comply with relevant legislation. Where no standards exist, we will work with our staff to develop systems which comply with best practice and eliminate or minimise the risks so far as reasonably practicable.



- 5. It is our stated intention to educate our students in health and safety management by incorporating the basic principles into all appropriate courses. Whenever possible, information on the legislation and standards applicable to the course will also be included. In areas of work which are highly regulated, staff and students will be expected to attend certain courses as a mandatory requirement.
- 6. We undertake to continually review and develop our safety management systems, with the overarching aim of conducting our activities in a manner which does not affect the health and safety of any staff, students, contractors, visitors or members of the public, or adversely affect the environment.
- 7. We are committed to this Policy and to the implementation and maintenance of the highest standards of health, safety and welfare across all aspects of our work. We expect every member of START TRAINING LTD to share this commitment and to work together to achieve it.

Section 1

All START TRAINING LTD workers, associates and learners have a right to work in places where risks to their health and safety are properly controlled. Health and safety is about stopping you getting hurt at work or ill through work. START TRAINING LTD is responsible for health and safety, but you must help.

Section 2

Specific health and safety policy statements.

START TRAINING LTDs arrangements for safe systems of work arising from the identification of hazard(s) and assessment of risk(s):

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RISK ASSESSMENT:

We will carry out suitable and sufficient assessments of the "general" risks to the health and safety of our employees and to others who might be affected by our work activities, in compliance with the Management of Health and Safety at Work Regulations 1999.

To ensure that this happens we will:

Identify all hazards with a potential to cause harm to our employees and others who may be affected by our business. The initial identification of hazards can be raised by any member of staff, at any time – through contact with a Line Manager or CEO or sending a report to the CEO.

Usually hazards will be identified at the planning stage of any new undertaking, introduction of new equipment or changes to procedures, at the time of any safety check, audit or inspection or at a safety committee meeting.



Once identified the appropriate Safety and Health Manager will, through consultation with managers and staff concerned, assist in the assessment of risk and, where required, the development of an operational procedure which eliminates or significantly reduces the risk. The assessment will evaluate the probability and severity of potential injury or damage.

Where we identify a risk of serious or imminent danger:

- Staff will be removed from any imminent danger by ceasing such activity as may be appropriate,
- We will establish appropriate procedures for controlling exposure to these risks,
- Sufficient competent persons will be identified to implement an emergency evacuation procedure from the premises and restrict access to any danger area ,
- We will analyse the options for eliminating, reducing or controlling the identified risks and then take the appropriate action.

There will be a review the assessments periodically and particularly where they may no longer be valid or where there has been a significant change in work activities, processes, etc.

Records will be maintained in writing, or electronic form, of the significant findings of risk assessments and identify employees who may be especially at risk.

If and when necessary START TRAINING LTD will provide appropriate health surveillance where there is an identifiable disease or potential adverse health condition related to our work.

Competent person(s) will be appointed to assist us in complying with our statutory duties for health and safety.

We will provide our employees and employees of other employers working on our premises with comprehensive and relevant information on risks, preventative and protective measures, emergency procedures and competent persons.

In addition to the above it is our policy to carry out any specific risk assessments in accordance with other Regulations and Codes of Practice as may apply.

WORKPLACE ENVIORNMENT/HOUSEKEEPING:

The Workplace (Health, Safety and Welfare) Regulations govern the health and safety of our indoor, working environment. Compromised access to or movement within the workplace can result in the possibility of collision with fixtures and furnishings, equipment, people or temporary obstructions, Slips trips and falls form one of the largest accident causation categories. Injury, damage and stress can result, as well as business loss and inefficiency.

It is our policy to exceed the minimum health and safety requirements of the law and to provide a working environment that is both comfortable and that maximises the effectiveness of employees. In order to achieve this, we will put in place arrangements for the assessment of risks when planning workplace layout and subsequent alterations to the working environment and provide, maintain and monitor appropriate control measures to minimise the risks identified.

Responsibility for implementing this policy lies with The CEO who in consultation with the curriculum lead and appointed Safety and Health Manager(s) will maintain sufficient work space, efficient layout, working temperature control, ventilation and lighting appropriate to the work activity. Line Managers and staff must practice good housekeeping and storage practice.



Work area and work space

Workstations will be provided that have sufficient space around them to carry out tasks safely. Space allowed will include sufficient room to manoeuvre equipment or materials. Adequate space will be allowed to accommodate the number of employees having to work in them. The minimum working space per person will not be less than 2.4 square meters.

Workstations

Workstations at which there is display screen equipment have additional arrangements relating to their use.

Office workstations comprise the largest single category in workplaces. Ergonomic and visual problems will be reduced by optimising workstations and tasks. Where needed, seating will be provided which is suitable for the person normally doing the task. Where needed, footrests will be provided which are suitable for the person normally using the workstation.

Disabled employees, or others having special needs, will have the workstations adapted for those needs, as far as is reasonable.

Heating

Office and similar environments rarely have such extremes of temperature as to cause ill-health. High temperatures can cause such symptoms as fatigue, loss of concentration, dehydration or heat cramps or dizziness. Low temperatures can produce effects such as shivering and loss of sensation. Both extremes can increase the risk that people may be more likely to have accidents.

Although the minimum recommended temperature for seated or light work is 16° C, where reasonable we will strive to maintain a temperature in the range of $18-20^{\circ}$ C.

Lighting

Adequate lighting will be provided throughout the premises, and particularly on staircases.

Defective switches, fittings, blown bulbs/tubes, etc must be reported to the appropriate manager, who will arrange for replacements as soon as reasonably practicable.

Adequate artificial lighting will be provided and maintained for outdoor pedestrian routes during the hours of darkness.

Ventilation

Poorly designed or maintained ventilation can affect accumulation of fumes/vapours/dust/humidity or can be responsible for uncomfortable draughty conditions.

Where reasonable, a fresh air supply will be provided by natural means or by a ventilation / air conditioning system, provided and maintained by the installer/supplier/maintenance contractor.

Air-conditioned rooms should not have the windows opened except when necessary for cleaning purposes.

Windows and doors

Windows will have lower edges of more than 800mm above interior floor level, or will have a barrier to prevent anyone falling out.

Opening and closing windows will be easily accessible, or will have other devices, cables or poles to avoid the danger of falls.



Assessment will be made of windows in vulnerable positions to determine if it is necessary to consider the use of safety material / safety film.

Transparent surfaces, such as glass doors or large glazed partitions/panels, will have markings that make them apparent.

Floors

Slips, trips and falls due to poor floor surfaces are easily prevented but may develop slowly due to wear, repeated minor damage, or faulty maintenance.

Underfoot surfaces will be provided that are suitable for:

- The environment where used (e.g. indoors/outdoors)
- The work activity where used (e.g. resistance to likely contaminants)
- The type and amount of traffic (pedestrian, hand trucks, etc.).

Underfoot surfaces will be maintained in good condition and free from damage and unevenness.

Where gangways for pedestrian traffic are needed through work areas, they will be kept clear.

Staircases

Staircases will be fitted with handrails and have, where appropriate, an anti-slip tread kept in good condition. Staircases will be well lit.

Housekeeping

The START TRAINING LTD Health and Safety Policy safety policy clearly sets out accountabilities and responsibilities for good housekeeping, e.g. management responsibility for each area, for parts used in common and for the premises as a whole.

All employees will be expected to apply the following procedures, where appropriate. Any spillage or leakage of liquids (e.g. water, drinks, etc) or other items which may be liable to constitute a slip hazard must be cleaned as soon as it is safe to do so. Otherwise, the spillage/leakage will be reported to the estates manager and warnings displayed.

START TRAINING LTD will promote good housekeeping by positive supervision and premises safety checks. Waste or surplus materials will be returned to a designated storage area or placed in a waste bin/skip and not left lying around to cause a hazard. Materials will be properly stacked so that they are not liable to constitute a hazard. Materials must not be allowed to encroach onto designated pedestrian walkways.

Cables for portable electrical equipment will be properly routed and / or covered to reduce the probability of trip risks.

Storage

A build up of unnecessary flammable material will increase the fire load. Untidy workstations cannot be effectively cleaned and materials stored on floors also prevent effective cleaning.

All staff, supervisors and managers have a responsibility to consult and work together to ensure effective use of storage facilities and the maintenance of satisfactory working conditions in the workplace. Work



stations - desk tops, under desk areas, shelving, cabinets and cabinet tops are to be kept tidy and free from accumulated materials. Keys will be removed from drawer / cabinet locks.

When storing materials consideration will be given to the positioning of loads in relation to their weight and bulk. Serious accidents can happen when heavy objects are placed, stored or retrieved at a high level. Heavy items will be stored as low as reasonably practicable. If high level storage is necessary due to limited storage space, packages will be split into smaller units where possible. Heavy, awkward loads will be stored in positions enabling safe access and handling - and not in low or high locations likely to require stooping or stretching during retrieval. Were equipment is stored consideration will be given to access for retrieval and the proximity to heaters, lighting and potential obstruction or other hazards.

Under no circumstances will temporary or permanent storage be allowed on fire escape routes, including staircases, whatever the size of articles or the intended length of deposition.

Goods must not be stored in pedestrian aisles, or placed there on delivery, since they present a tripping hazard or obstruction.

Storage areas will be checked to ensure that flammable material and ignition sources all separated. Materials having symbols that identify hazards must be stored according to manufacturers' / suppliers' instructions.

Where racking / shelving is provided, it will be of sufficient strength to carry the intended objects or materials. All staff are responsible for the safe stacking of items / material on racking, shelves and in cabinets relative to stability and security.

Racking and cabinets will wherever possible be secured to walls, floors, ceilings or other racking, as recommended by the supplier/ installer or safety and health co-ordinator(s) upon inspection.

Managers will review departmental housekeeping, storage and safe working with the appointed Safety and Health Managers(s) appraised of performance regularly.

Materials and records which are not required for immediate access will be archived and greater use made of electronic data storage where practicable.

Cleanliness

Routine premises cleaning will take place outside normal office/shop/business hours to reduce the risk of slips on wet floors or trips on trailing cables from cleaning equipment.

Dirty or contaminated floors contribute to the probability of slips, trips and falls. Cleaning operations can themselves add to the risk whilst they are in progress.

Floor treatment (washing, polishing, sealing, etc) will be applied to each surface compatible with that surface type, to prevent either slip hazards or surface deterioration.

Contract cleaning services and contractors undertaking treatment and maintenance of underfoot surfaces will be required to show that their employees receive adequate training, and are provided with the necessary information to enable all work to be properly and safely undertaken.



The system of work for cleaning activities will where necessary include the use of safety barriers and warning signs, since employees, visitors or other contract cleaners need to be aware of the dangers.

With regard to premises lease conditions arrangements will be made to ensure outdoor pedestrian routes on the site are regularly swept and, during icy/frosty conditions, are salted/gritted/sanded as appropriate.

Waste Disposal

Waste (paper) will, wherever possible, be classified "recyclable" and appropriate collection bins provided. Toner cartridges too will wherever possible be recycled.

Broken glass, crockery or other potentially sharp material will be wrapped and disposed of in the general waste bins. Larger packaging material will need to be removed as necessary.

Refer to COSHH assessments and guidance notes for disposal of packaging or spillage waste where materials carry hazard markings.

Welfare facilities

Sufficient toilets, washbasins/washing facilities will be provided and maintained in a good condition. Hot and cold water, or water at a suitably controlled temperature, will be provided, together with soap, and towels / dryers and sanitary disposal.

An area separate from working areas will be provided for employees to consume food and drink.

There will be adequate storage for outdoor clothing.

A readily accessible supply of drinking water will be provided, from the public water main supply, where possible. Drinking water supplies will be marked to distinguish them from other supplies.

Security

Unauthorised access to START TRAINING LTD premises will be prevented through limiting access by the public to staffed reception areas. Visitors to START TRAINING LTD premises sites will be under the supervision of staff hosting the visit.

Personal Alarms will be available to staff on request. This Policy contains specific reference to staff safety in connection to aggression and violence which should be read in conjunction with security issues.

Employees are reminded that they have a legal obligation under the Management of Health and Safety at Work Regulations to inform their manager of situations where they see serious imminent danger to health and safety, or any matters where they see a shortcoming in our arrangements for managing health and safety.

Where reasonably practicable, we will adapt the premises and facilities to those employees with disabilities. (Subject to DDA).

FIRE SAFETY:

Exposure to fire can result in serious, even fatal, injury through burns and the inhalation of smoke. It also has the potential to cause severe business interruption through destruction to building structures and services, equipment materials and business records. START TRAINING LTD Policy to safeguard employees also makes good business sense.



Fire Risk Assessment has ensured that the potential for fire outbreak is minimised with appropriate control measures being in place to minimise the outstanding risk(s). These measures will include the following arrangements, procedures and controls:

Inspection of premises for fire safety will be incorporated into routine safety checks carried out by the appointed Safety and Health Managers. Staff must maintain good standards of housekeeping to reduce the build up of flammable material and keep electrical equipment ventilation slots and heaters unobstructed. Routine electrical inspection, user "pre check" visual examination and defect reporting procedures further reduce the likelihood of electrical source fires.

- Fire detection equipment to be installed where fire risk assessment indicates a need. Such equipment to be inspected annually by a competent agent.
- Fire alarms to be tested weekly during normal working hours to ensure all personnel are familiar with the sounders.
- Evacuation drills will be conducted by site managers at least once per year. Evacuation performance will be evaluated and records of tests / drills maintained.
- Where installed, fixed fire suppression apparatus will be inspected annually; portable extinguishers will be inspected annually by competent agent.
- Emergency lighting will be provided as appropriate following fire risk assessment
- Appropriate fire extinguishers will be placed at clearly labelled fire points.
- Emergency exit routes will be indicated and be unobstructed at all times.
- Precautions in respect of disabled people will be implemented.
- We will inform all staff that they follow fire evacuation procedures and assembly points for each site.
- Contractors undertaking work on START TRAINING LTD premises will be required to indicate
 method statements which indicate their arrangements for risk control in relation to hot work or any
 other fire risk.

People unable to negotiate stairs:

In the case of any visitor to START TRAINING LTD premises, who is unable to safely negotiate stairs, steps will be taken by the host to ensure that the appropriate Fire Marshal will nominate a fellow member of staff to accompany them to the nearest fire lobby*. They shall remain there while the Fire marshal notifies their whereabouts in the course of making his / her report to the Co-ordinator at the assembly point

Any START TRAINING LTD personnel who have mobility difficulties will be recognised as being in need of assistance in the evacuation of the building and the co-ordinator will, as above, notify the Fire Service.

Employees are reminded that they have a legal obligation under the Management of Health and Safety at Work Regulations 1999 to inform their manager of situations where they see serious and imminent danger to health and safety, OR any matters where they see a shortcoming in our arrangements for health and safety protection.

These arrangements will be reviewed at least annually and on any significant change in the business or the premises. Improvements and alterations may be carried out, following advice from the Fire Prevention Officer, our insurers, or our safety and Health Manager(s)



PROCEDURE: On hearing the evacuation alarm, take immediate action to leave the building by the nearest, most direct exit route - avoid lifts - and assemble at the appropriate muster point. If using IT equipment "lock" the workstation, switch off other electrical equipment, where practicable close doors and windows but leave the premises without further delay.

*Fire Lobby means a suitable area adjacent to a recognised Fire Escape route.

Staff working for Host Employers

START TRAINING LTD employees working for Host Employers will be informed of fire and emergency action to be taken at their site (or site at which they work) by the Host Employer.

BOMB ALERTS:

Any suspect package, item or in any receipt of threatening telephone calls will immediately be notified to Line Management who will in turn notify the police.

The manager or deputy will have contact with the Manchester Emergency Response Network. If the building is advised of an external bomb alert the Building Manager will advise all tenants to "stand by", Wardens will be advised. It may or may not be advisable to evacuate and an informed decision will be made by the Authorities and Building Managers regarding the appropriate action - this will then be communicated to all staff via Wardens

If an internal threat is received a "search" will be initiated by Wardens. Any suspicious item will be identified BUT WILL NOT BE MOVED. The Building Managers will be advised of the location and description of any suspicious item who will in turn advise the authorities. Any compromised exits / routes will be closed and wardens will advise staff accordingly. Staff will be made aware of Standby and Search conditions by Wardens and should gather personal belongings to assist in the identification of any suspect items.

Staff must prepare to evacuate <u>BUT WAIT</u> until given the evacuation signal - a sounding of the alarm. Prior to this a clear instruction as to the evacuation assembly location will be given to Wardens and relayed to staff...

Upon hearing the alarm evacuate the building to the point indicated by Wardens and Building Manager.

All other work locations must consider a "Bomb Alert" arrangement - staff must be notified of "local" arrangements accordingly. Bomb Alert information will be provided to all sites where it is considered necessary.

ACCIDENT REPORTING / INVESTIGATION / RECORDING:

It is START TRAINING LTD policy that all accidents – regardless of injury – are reported to line managers. Near miss and damage only incidents have a potential for injury and as no accident is an intended outcome of a START TRAINING LTD systems of work, all such incidents must be reported and analysed to ensure that recurrence is avoided.

Where injury is sustained – regardless of severity – the START TRAINING LTD accident book and an accident report form must be completed, this is held by the tutor. Both forms will be forwarded to the CEO.

Where first aid attention is required, this will be provided without delay. The appointed Safety and Health Manager(s) will make the necessary notification to comply with the Reporting of Injuries, Diseases and



Dangerous Occurrences Regulations 1995 as required by the Social Security (Claims and Payments) Regulations 1979. Our enforcing authority for reportable accidents, diseases and dangerous occurrences is The Health and Safety Executive.

Employees must report all injuries to their manager immediately after treatment.

If, because of their injury, employees are incapable of making an immediate entry, then that entry must be made by their manager, the first-aider, the appointed person, or a nominated person.

Following any accident the employee's manager will notify the appropriate Safety and Health Manager(s) who will:

- Assist line managers with analysis of near miss incidents and minor injuries,
- Complete an accident investigation report where deemed necessary (incidents with the capacity for significant loss or injury),
- Notify the enforcing authority, if the accident is reportable.

Following any accident of any severity that requires treatment, the employee's manager will take statements and retain any other documents related to the accident, such as containers (with contents listed), equipment logs, environmental or process recordings, etc.

If the injury is of a serious nature or if there is any doubt, the injured person will be sent to the nearest hospital for treatment.

Although it is not our legal duty, we will notify the enforcing authority of injuries to non-employees, e.g. contractors, if the injury takes place on our premises and we become aware of it.

Accidents and injuries that are reportable to the enforcing authority will also be reported to Senior Management and to our employer's liability insurer.

In cases of serious accident or ill health affecting staff the appropriate manager will attempt to inform a member of the employees' family as appropriate.

Records of accident investigations will be retained in the HR file of the injured staff member(s).

It is the START TRAINING LTD policy to investigate:

- All accidents resulting in any reportable injury or losses of any assets
- All RIDDOR reportable accidents
- All near-misses.

We will co-operate with our insurers, in order to reduce our premium as far as we can. If the insurers have any advice on reducing risk, we will follow that advice where reasonably practicable.

FIRST AID:

The Health and Safety (First-Aid) Regulations 1981 require that all employers make adequate provision for first-aid in respect of employees.

We recognise our legal duty to make sufficient provision for first-aid to employees including those working away from our premises. We will assess risks to employees and make appropriate first-aid arrangements to deal with the risks. We will indicate those staff trained in First Aid at Work and reassess the first-aid provisions annually, or whenever there is a relevant change in the workforce or the hazards to which they are exposed. When there have been significant changes, we will revise our arrangements accordingly.



Additionally, we will ensure that contractors on our premises either have sufficient first-aid provision, or if their work involves no special risks, the contract may include their use of our facilities, by agreement.

Medical assistance

In the event of anything other than minor injuries, medical assistance must be sought.

Our first-aider(s)/appointed person(s) will normally summon specialist assistance via 999 emergency call, but employees are reminded that ALL emergency calls must all go via the switchboard to avoid confusion or duplication.

Management responsibility

Management responsibility for all first-aid functions is held by the CEO and the appointed Health and Safety Manager(s) These responsibilities are to:

- Encouraging staff to take training in first-aid, or as an appointed person
- Authorising refresher training, as required.

The Safety and Health Managers(s) are responsible for:

Reporting notifiable accidents to the appropriate authority.

Appointed First Aiders are responsible for:

- The effective day-to-day operation of first-aid matters. These functions will include:
- providing first-aid cover
- keeping adequate first-aid equipment and supplies
- Recording details of accidents and treatments
- Notifying Safety and Health Managers of incidents, immediately in the case of serious accidents requiring medical assistance.

ELECTRICAL SAFETY:

The Electricity at Work Regulations apply to our workplace. We will fulfil our obligations under the Regulations.

Contact with live electrical conductors is potentially fatal and fire or explosive discharge hold serious risk for both people and premises. Electrical installations and "systems" must be safe and without risk – all premises and portable appliances must be subject to regular checks, staff must be aware of the potential dangers arising from electrical defect and must report any such findings.

We will make sure that any electrical contractors employed to carry out electrical work on wiring or equipment are competent, belong to an appropriate body and comply with all relevant safety standards.

We will inform all staff of basic electrical safety awareness and company procedures at induction, additional training needs will be met as necessary, to ensure they:

- know how to use equipment safely
- know what they are not permitted to do
- understand what action they should take in an emergency involving electricity
- know who is authorised to carry out electrical work
- Know who to report any electrical problems to.



- Users of electrical equipment will carry out a visual pre use examination of equipment prior to connection to the power supply. Any item indicating overdue inspection will not be used.
- Any visual defect will be reported to the Line / Office Manager the equipment will be taken out of service and not used until remedial action is completed.
- The identification of any defect / fault during the use of electrical equipment will result in the equipment being switched off (and unplugged where possible) – reporting and withdrawal from service action as above.
- It is START TRAINING LTD Policy that only officially recognised electrical equipment, subject to the electrical safety check regime will be used in the workplace.
- Electrical checks, investigations and repairs will be attended to by competent agents / contractors or staff competent to the required standards for the work involved. Line Managers / Supervisors will oversee this Policy.
- Safety and Health Managers guidance will be sought where appropriate. Wherever necessary, specialist electrical assistance will be obtained from outside the company.

No work must take place on or near live electrical conductors by START TRAINING LTD employees unless fully trained and qualified in electrical safety.

- cable management will be considered at all times
- cables will be run to avoid trip hazards and accidental damage / overheating
- Extensions will not be overloaded and coiled leads extended to avoid overheating.

Managers must make sure that any new equipment they purchase is CE marked and complies with Provision and Use of Work Equipment Regulations where appropriate.

Replacement of light bulbs / tubes will generally be conducted by competent contractors. Where START TRAINING LTD staff undertake this task the appropriate lighting circuit must be switched off and the policy for working above ground level followed. Eye and hand protection will be used in case lamps or tubes shatter during removal / refitting.

Where staff do replace light bulbs / tubes the oil unit must be disposed of safely. Tubes should be consigned to authorised collection points and bulbs disposed of safely so as not to endanger cleaners or refuse collectors.

WORK EQUIPMENT:

The Provision and Use of Work Equipment Regulations 1998 apply to the functioning and safety of our work equipment. Where reasonable, we will adapt the work equipment, or its use, to those employees with disabilities, as long as this creates no additional hazards.

In order to minimise the risk of injury from work equipment, we will put in place arrangements for the assessment of risks and then create appropriate control measures to minimise the risks identified. These measures will include the following arrangements and procedures:

- A full assessment of all new or second-hand equipment purchased
- All equipment purchased will comply with any relevant product safety standards
- All hired or rented equipment will be required to comply with the Regulations, and will include the provision of comprehensible information on safe use
- Inspection of the equipment and testing where necessary



- Adequate and identifiable means of isolation, where appropriate
- The provision of suitable and effective safety devices
- The provision of suitable and effective controls
- Suitable and readily comprehensible signs and warnings
- Suitable general, task and emergency lighting
- Suitable training

These arrangements will be reviewed at least annually and on any significant change in the type, nature or use of equipment.

Where it becomes necessary to move any work equipment – i.e. audio visual / IT equipment - which cannot be readily and safely moved by manual techniques, mechanical aids will be employed and staff involved will have undertaken training in manual handling techniques.

Where other (larger) work equipment has to be moved contractors will be employed for this purpose.

Employees are reminded that they have a legal obligation under the Management of Health and Safety at Work Regulations 1999 to inform their manager of situations where they see serious and imminent danger to health and safety, or any matters where they see a shortcoming in our arrangements for health and safety protection.

COMPUTER TERMINALS:

The Health and Safety (Display Screen Equipment) Regulations 1992 apply to work with Computers.

Display screen operators may suffer from postural difficulties and visual fatigue. Although DSEs do produce some radiation, HSE assessment has concluded that the levels produced are no more than those from the environment and a wide range of other electrical equipment in general.

Postural hazards result from poor ergonomics and working environment. The following may produce fatigue-related conditions:

- sitting in an immobile position for long periods
- high rates of repetitive finger movements, with the wrists bent
- poor circulation to the legs
- Pressure from the seat/chair upon the thighs.

Visual fatigue may result from the following:

- poor screen display, such as low contrast or flickering
- high levels of ambient light compared to the screen display
- Reflections or glare.

These can produce eye strain, headaches or other related symptoms.

It is our policy to exceed, where possible, the minimum health and safety requirements of the law. We aim to provide a working environment that is both comfortable and maximises the effectiveness of employees. Although the Regulations only apply to DSE users or operators we will try to apply the principles to all DSE workstations regardless of the category of user.



In order to achieve our goals, we will put in place arrangements and procedures for the assessment of risks from the use of DSE. The risk assessment will be followed by the provision, maintenance and monitoring of appropriate control measures to minimise any risks identified.

Responsibility for implementing this policy lies with all staff involved in computer use. Line Managers must be familiar with good practice and encourage staff to comply with the good practice guidelines. Safety Representatives and Safety and Health Managers will incorporate good practice assessment into routine Departmental safety checks.

Workstations used by employees classified as DSE users will receive priority for corrective measures, if any are needed.

Desks will be chosen with a worktop height between 580 and 790mm, unless the operator has special needs. When existing desks are replaced, the new desks will conform to these parameters.

Employees will be considered to be operators when:

- they use DSE regularly and continuously for more than an hour at a time
- they depend on display screen equipment to do the job, i.e. there is no alternative way of doing the job
- they need additional training and/or particular skills in the use of display screen equipment to do the job
- fast transfer of information between operator and screen is important
- The work being done requires a high level of attention and concentration and the consequences of error may be serious for the business.
- Glare from bright lights, screen reflections and desktop finish will be modified where reasonably practicable by the use of:
 - Shielding or blinds
 - Replacing or repositioning sources of light.
 - Rearranging document holders or all parts of workstations.
 - Covering work surfaces.
 - Modifying the colour or reflectance of walls, ceilings and furnishings near to the workstation.
 - Anti-glare screen filters will only be considered if other measures fail to solve the problem.

Changes in workstations will be discussed with the operators before they are implemented. Table-top printers for standing operation should be installed to a height which provides a normal working position. For prolonged use of DSE such as data entry, the keyboard height will be such that when the user's fingers are resting comfortably on the home-row keys, the lower arm is approximately horizontal.

Keyboards will be chosen that can be tilted and separated from the screen to enable the operator to select a comfortable working position and avoid fatigue in the arms, wrists or hands. Desks will be large enough to allow normal tasks to be performed that are associated with the user's work.

Desk tops will, where reasonably practicable, have a low reflection surface and allow flexible arrangement of the screen, keyboard, documents and related equipment.



Display screen tasks will be designed where possible in a way that periods of DSE use are spaced throughout the working day. Breaks will be arranged before fatigue where possible, rather than as a recovery period. Short, frequently occurring breaks will be taken, rather than longer less frequent ones.

Workstation users will be provided with suitable and sufficient training and information. The training will be recorded in the employee's records and refresher training given, as required by the job. Training will include awareness of the symptoms of work related upper limb disorders.

Document holders will be provided on request. They will be stable and adjustable by the operator, so as to minimise the need for uncomfortable head and eye movements (operators will be advised to position the holder at a similar viewing distance from the display screen and in the same plane).

Operators will be advised that displays having vertical screens should be adjusted in height, so that the top row of displayed characters is level with, or just below, the user's eye height when the user is in a comfortable operating position.

Operators will be advised that displays having tilted screens should be positioned to minimise reflection of lighting,

Footrests will be available on request, so that when the chair is properly adjusted for arm and wrist position, the operator's thighs can be positioned horizontally to reduce lower leg fatigue. Mouse mats will be provided with other aids considered as appropriate.

PERSONAL PROTECTIVE EQUIPMENT

The Personal Protective Equipment at Work Regulations 1992 applies to our work activities. Personal protective equipment (PPE) will only be used where it is not reasonably practicable to modify the activity, the process, or the method of work to prevent risk. This is because it protects only the wearer, so others who may enter the zone of hazard without PPE will be at risk.

Specific assessments to comply with the Personal Protective Equipment at Work Regulations 1992 will be carried out by the manager of each area or department.

For all activities requiring the use of PPE, a record will be made of the protective equipment, the operations and the personnel involved.

Line Managers are responsible for ensuring that staff are issued with appropriate PPE. Individual staff are responsible for the checking the serviceability of PPE and for its appropriate use. Staff must report loss or obvious defects in PPE to management as soon as practicable and safe to do so.

All PPE required by the risk assessment for the activity will be provided without charge. Only PPE that complies with the relevant British or European standard will be purchased. Where appropriate, only 'CE' marked PPE (and replacement components of PPE) will be purchased. PPE will be selected which does not interfere with other items of equipment.

Head protection: All staff with a need to visit any site classified a Head Protection Site or visiting any location where head injury is likely must be issued with and use a helmet complying with EN397 and suitable for the users needs.



Foot Protection: All staff involved in manual handling of loads with the potential to injure the feet if dropped must be issued with and use protective footwear, with toe protection, complying with EN 345. Staff visiting any site classified a Foot Protection Site or visiting any location where foot injury from falling, rolling or penetrating hazards is likely must be issued with and use protective footwear, with toe and sole penetration protection, complying with EN 345

High Visibility garment: All staff visiting any location where transport movement is likely must be issued with and use a high visibility garment complying with BSEN 471

Eye protection: All staff engaged in any work on START TRAINING LTD premises which has the likelihood of causing particles to enter the eye must be issued with eye protection complying with EN 166 (1F) and having side protection. Care must be taken to ensure compatibility with spectacles worn by the user. If visiting a location classified an Eye Protection zone on non START TRAINING LTD premises the employer / occupier is required to provide suitable eye protection and START TRAINING LTD staff are required to use this.

Hearing protection: If visiting a location classified a hearing protection zone on non START TRAINING LTD premises the employer / occupier is required to provide suitable PPE and START TRAINING LTD staff are required to use this. If engaged in activity on START TRAINING LTD premises where the assessment of risk to hearing has indicated a need for ear protection this will be issued.

Hand protection: If engaged in activity on START TRAINING LTD premises where the assessment of risk to injury or contamination of the hands has indicated a need for hand protection this will be issued.

Line Mangers and staff must continually appraise the possibility of risk and additional need for further personal protective equipment. The safety and health managers will be available to advise on equipment specification.

REPORTING DEFECTIVE EQUIPMENT, PREMISES - UNSAFE WORKING PRACTICES:

Defects and poor working practices can develop in between inspections and must be attended to as soon as they are recognised to remove or limit the risk(s). Defective equipment or premises may be directly responsible for injury or may contribute to ill health over a period of exposure. If not detected these defects or other poor work practices will almost certainly result in personal loss to those involved, or others affected by their actions, or general business loss.

Notwithstanding the arrangements in place for the selection of appropriate premises and work equipment – the detection of faults and ongoing review of working practices through staff appraisal procedures, routine observations, inspections and risk assessments, accident investigation and the work of the Safety Committee – all staff will utilise the START TRAINING LTD "Defect Reporting" arrangements, in conjunction with their managers.

Staff identifying defects will initially draw these to the attention of Line Managers to enable further exposure to be avoided. Faulty equipment will be "removed" from use. Signs indicating "Faulty do not use – Reported to management" will be attached – electrical plugs switched off – withdrawn.

The Manager is responsible for taking immediate, longer term action as appropriate. Significant risk will be prevented by withdrawing defective equipment from use – marking it "Danger do not Use" and arranging for repair / disposal as necessary. Defective premises must also be attended to in a similar way with areas



of significant risk being marked and cordoned off as appropriate to prevent danger until remedial action has been taken.

Poor work practices may result from inadequate information, instruction or training, inappropriate equipment selection, poor control of physical factors etc. Where concerns are expressed by staff, supervisors or become apparent as a result of Policy / Risk Assessment review, revision of work systems will be required.

PROCUREMENT:

Work equipment and materials will be assessed and evaluated as suitable for the intended purpose where necessary through consultation with the Manager and others as appropriate.

Any specific risk assessment arising out of the introduction of additional work equipment will be undertaken in accordance with this Policy.

An appropriate location(s) will be identified on site for storage / operation and if mobile it's transportation requirements. Power (or other supply) requirements will be considered and any associated emergency action requirements assured.

Equipment will be required to be supplied with adequate operation and maintenance information and, where necessary suitable and sufficient training for the staff involved. Service and maintenance arrangements must be established if purchased, contractual support details available if on lease. This will include any inspection or testing requirements. Where appropriate any necessary records will be set up.

HAZARDOUS SUBSTANCES:

The Control of Substances Hazardous to Health Regulations apply to our working environment. The aim of this Policy and associated procedures is to provide a structured assessment and control strategy as required by the Control of Substances Hazardous to Health Regulations

Direct or indirect exposure to hazardous substances, either used or created in the workplace, has the potential for immediate reaction / injury or cumulative, longer term damage and consequential serious ill health. In addition to these human factors – certain hazardous materials may incorporate additional fire risk or environmental risks.

Hazardous substances present in various forms, solid, liquid, dust particulates, fumes, gas and vapours – some transforming from form to form as a result of temperature or pressure changes. Exposure may result from inhaling particles or gasses released into the air, through ingesting materials if hands are not fully cleaned e.g. between handling materials and eating / smoking, by absorption of harmful material through unprotected skin or eyes, and by injection of substances in puncture injuries – allowing ready access to the blood.

The departmental heads will appoint Hazard Control Officers (HCO) and will be responsible for the implementation of the Control of Substances Hazardous to Health Regulations (COSHH). The appropriate Safety and Health Managers will co-ordinate the operation of the START TRAINING LTD COSHH Policy through consultation with Department / Curriculum Teams.

It is START TRAINING LTD Policy to use less or non hazardous materials wherever possible. All hazardous materials in use will be assessed to determine the need for its use, frequency and duration of use and the circumstances of its use. An inventory of such materials will be maintained by the departmental heads.



The HCOs will carry out appropriate investigations and, from supplier hazard information material, will produce user information. Managers are responsible for bringing to the attention of the HCOs the proposed / purchase of additional materials bearing warning information. In all cases where hazardous materials are used - hazard information sheets will be available to staff at that site.

To ensure that the assessments meet the "suitable and sufficient" requirements and are maintained in a consistent standard the following guidance set out the phases of assessment.

PHASE 1: This preliminary phase will involve the collecting of existing information regarding materials used and the preparation of inventories of substances and activities concerned. This will provide the essential data necessary to commence assessments and may be undertaken by Departmental / Team Leaders with no further training need.

Completed preliminary assessments will be passed to the COSHH Control Officer who will prioritise further assessment and maintain the COSHH ASSESSMENT LOG BOOK.

It should be remembered that ALL materials used within START TRAINING LTD premises must be subject to this Policy and the purchasing of materials must comply with the need to assess any possible associated hazard. Consequently the COSHH Control Officer must be advised of any new materials falling within the parameters of the guidance set by HSE

Any unidentified materials must be immediately returned to "Stores". Upon receipt of any such materials the Departmental manager will contact the COSHH Control Officer for advice on further action.

Following the initial assessment, review assessments will be conducted annually by the COSHH Control Officer

PHASE II:

Where the COSHH Control Officer deems it necessary to undertake a detailed assessment of the risks associated with the material / substance, A COSHH assessment will be completed and filed in the COSHH ASSESSMENT BOOK.

The screening process will determine whether data is held on a material / substance and, if not, the COSHH Control Officer will send a standard letter, to the appropriate material supplier / manufacturer. Upon receipt these data sheets will be incorporated into the assessment process.

Supplier / manufacturer data sheets will be filed with the appropriate user / department.

The COSHH Control Officer will conduct the assessment in consultation with material users and where necessary Departmental / Team Leaders. Where necessary required action will be established and recorded. Those designated with the responsibility for action, and the agreed time frame, will be recorded.

Where materials are to continue to be used within the START TRAINING LTD operations the departmental manager or designate will fill in a COSHH assessment form. Completed forms will be held on file in the COSHH ASSESSMENT LOG BOOK with copies supplied for the information of those using / exposed to the material via Line Managers as required.



COSHH - MATERIAL / WASTE DISPOSAL

Where necessary hazardous waste will be disposed of through appointed agencies, licensed in accordance with appropriate legislation, with records of disposal being maintained by the appropriate Manager with copies retained in the COSHH ASSESSMENT LOG BOOK

Line managers / supervisors are responsible to see that COSHH information is provided for staff involved with the materials and that it is used in accordance with the guidance. This may involve, where appropriate, the use of necessary Personal Protective Equipment (PPE) and specified disposal arrangements for materials / packaging. Appropriate emergency procedures will be applied as specified in the user information sheets for spillage or accidental exposure.

It is the responsibility of staff using materials bearing hazard markings (orange square containing black symbol and warning information) to familiarise themselves with the necessary user information sheets and employ systems of work as indicated. With the exception of Tipex correcting fluid, Work Experience young people will be prohibited from using hazardous substances within START TRAINING LTD.

NB. COSHH control officer may be department technicians or department manager. Each department or curriculum leader is responsible for assessing and recording the introduction and use of chemicals.

STAFF TRAINING:

Each member of staff has the responsibility to ensure their own safety and that of others - arising out of their actions. Consequently it is our policy to ensure that staff are competent to undertake their duties. Line Managers have the responsibility to see that staff are developed accordingly and will carry out performance appraisal. This appraisal will take into account the way in which work is carried out in relation to this policy and safe systems of work. Line managers will be supported by the appropriate Safety and Health Managers in all safety matters.

Newly appointed members of staff will receive an induction to START TRAINING LTD which includes an introduction to the arrangements for Safety and Health.

Line Managers will be responsible for familiarising new staff with their office, providing an introductory tour of the site.

This induction process will bring to the notice of newly appointed staff: the outline of the safety management approach, where the safety policy and supporting guidance can be found; the emergency procedures applying; accident reporting and first aid arrangements and reference to safe working practices associated with remote working; personal attack alarms and safety training.

Line Managers will, with the support of the appropriate Safety and Health managers, evaluate the duties of the posts within their command to identify the specific health and safety related training needs. Through consultation with the CEO, training will either be devised and delivered - or resourced from elsewhere - to meet these needs. Records will be maintained by START TRAINING LTD.

Line Managers will arrange for staff with duties which require them to visit premises of Sub Contractors and training locations to be provided with additional training in health and safety awareness which will be updated from time to time as necessary in accordance with developments in legislation and Codes of Practice.



Staff who are involved in work likely to incorporate elements of manual handling will be provided with training in the evaluation of the task and operational options, their individual capability, load characteristics and good handling techniques.

INTERVIEWING OF CLIENTS / MEMBERS OF THE PUBLIC:

Where staff interact with a number of clients and members of the public in connection with their work, there is a potential for them to be exposed to hostile behaviour which may involve verbal or physical abuse. There is also the possibility that allegations of misconduct may be made against staff.

Guidance is available on interviewing practice and all interviews will be conducted in accordance with this.

Staff who undertake interviewing activities will be eligible for training in Recognising and responding to Aggression and Violence. Reception staff and those who are required to interview members of the public, both on and off START TRAINING LTD premises are likely to encounter possibly abusive or threatening behaviour. These staff, and others for whom the training is considered appropriate, will undertake training in Recognising and Responding to Aggression and Violence.

Interviews involving the public, which are conducted on START TRAINING LTD premises, will take place in rooms / areas which enable visual / audible contact with other members of staff or where "alarm" facilities are provided. Where alarms are not installed staff should ensure that they are in possession of operational personal alarms or appropriate alerting methods are arranged. .

Where staff visit non START TRAINING LTD premises for interviewing, these guidelines should be followed wherever possible. If insufficient facilities exist staff should reconsider interview arrangements and assess the risks associated with the circumstances.

OUTREACH STAFF:

The Health and Safety at Work etc. Act 1974, the Management of Health and Safety at Work Regulations 1999, and the Workplace (Health, Safety and Welfare) Regulations 1992 apply to our employees who visit other premises in the course of their work: The generic term "Outreach Staff" is used.

We recognise that this work is carried out in places that are not under our direct control. We will provide additional measures, such as information, instruction and training, to ensure their safety on the premises of others.

Where any of our employees are on other premises for anything other than short periods, we will ensure that those in control of the premises are aware of the proposed activities of our employees. We will also require our employees to be briefed on safety management arrangements at that location.

Arrangements and procedures for Outreach Staff

Staff will only visit none START TRAINING LTD premises if this is a necessary START TRAINING LTD business function which cannot be undertaken at START TRAINING LTD premises. This Policy recognises the right of any staff preparing to visit or visiting other premises to decide not to visit or terminate such a visit if concerned for their safety or the safety of company equipment or their own property.

Before attending any non START TRAINING LTD premises, staff will assess (with their line manager if appropriate) the need for the visit and any known risk(s) associated with the location. Line Managers are responsible to ensure that any protective or other equipment requested or deemed to be necessary during



the visit – including safety foot / head wear, high visibility garments, mobile telephone, personal alarm is supplied. Staff issued with any such equipment are responsible for ensuring that it is fully operational and that they are familiar with its use prior to making the visit.

If staff feel that they may come into contact with stray animals "any animal encountered on the premises being visited should be under the control of the employer / householder etc. (the responsible person) If concerned at the presence of an animal under these circumstances staff should ensure that the "responsible person" secures the animal or terminate the visit.

Staff making visits to non START TRAINING LTD premises will do so in the company of a colleague or associate from a partner organisation where potential risk is perceived (where such support is considered to reduce this risk) and where it is practicable to do so. All staff making outreach visits must leave information at their office base (IT Schedule) giving details of their visit(s). Staff are responsible for informing their line managers / colleagues of any changes to the schedule during the period away from the office. Regular contact with line managers / colleagues may be appropriate throughout the day where various "high risk" visits are to be made. These arrangements should be clearly made prior to leaving the START TRAINING LTD site.

Where Outreach Workers are to spend significant periods of time on non START TRAINING LTD premises they should be advised of the hazards they may face and how to deal with them. We will require all employers / occupiers involved to provide our staff with written information on emergency procedures and to make available their first-aid arrangements, sanitary and washing facilities, and their facilities for rest etc. If the latter are not available, our staff will be given sufficient time to locate local alternatives for breaks and sanitary facilities.

Staff visiting other employer's premises must conform to all their arrangements for safety management. Fire, security and liaison, such as signing the visitors' book, observing no smoking or other specific control areas, use of appropriate PPE in designated areas and reporting to named managers before entering or leaving the site or moving to a different area.

PREGNANT STAFF:

The Management of Health and Safety at Work Regulations apply to any of our employees who are pregnant, breast feeding or who have given birth within the last six months. The Workplace (Health, Safety and Welfare) Regulations require us to provide rest facilities for new or expectant mothers.

Staff have the responsibility to advise START TRAINING LTD of their condition. We recognise the extra vulnerability of pregnant and nursing mothers, additional risk assessments will be made when a woman notifies START TRAINING LTD that she is pregnant. The generic risk assessments will be reviewed taking into account the individual concerned and further guidance provided if appropriate for new and expectant mothers. Line managers and pregnant staff may consult the Safety and Health Manager(s) for additional guidance on work activities. Female staff will be informed of any additional risks they may face if they become pregnant or are breast feeding. Additional measures will be applied for six months after the birth.

START TRAINING LTD is only required to take extra precautions for pregnant or nursing mothers if we are notified of their conditions. If pregnant employees do not provide confirmation from their medical practitioner, we will request medical confirmation.

The assessment of our display screen equipment workstations, the resulting control measures and guidance to staff, present no additional risk to pregnant women or nursing mothers.



As additional risks to pregnant women and nursing mothers may arise through:

- extended periods of working
- strenuous manual handling
- sitting/standing for extended periods
- work in areas or on surfaces with a higher risk of slips, trips or falls
- activities which prevent the employee leaving the work area for rest or to use toilet facilities
- Any case where the medical practitioner of a pregnant woman or nursing mother states that her normal work could affect her health and safety.

Line managers and staff concerned should ensure such activities or circumstances are avoided.

Whilst START TRAINING LTD can endeavour to maintain satisfactory working conditions for pregnant or nursing staff careful consideration must be given to any outreach working on non START TRAINING LTD premises.

Additional guidance may be necessary and will be sought from the appropriate Safety and Health Manager.

Staff in this condition who are required to visit locations and activities away from START TRAINING LTD premises should be aware of the potential exposure to certain risk(s). Biological risks such as Rubella (if not vaccinated or having previously contracted German measles) or Toxoplasmosis; certain chemical risks; risks from exposure to lead or lead products or unnecessary exposure to the use of radiation. Consequently visits to sites where these risk(s) may exist:

- contact with children
- care
- nursery schools etc
- contact with animals including veterinary practices, horticulture
- Construction locations where contact with soil / earth is possible; lead / chemical process works etc should be considered and avoided.

If additional risks to pregnant women and nursing mothers cannot reasonably be reduced, the START TRAINING LTD will, where ever possible, find alternative work.

Arrangements will be made to provide a private rest area for pregnant women and nursing mothers (where smoking is not permitted). The rest area will be situated as near to sanitary facilities as possible.

YOUNG WORKERS - WORK EXPERIENCE / STUDENTS:

We will carry out a suitable and sufficient risk assessment for all work involving young persons (16 to 18 years old) prior to their employment, and will communicate the result of this to them on their commencement of work.

Risk assessments for work involving young person's will be modified with the following considerations relating to their:

- Physical and psychological capacity to carry out the work effectively
- Potential exposure to toxic or harmful substances or agents (including radiation)
- Inexperience in the recognition of potentially hazardous situations, or lack of training
- Potential exposure to extremes of heat or cold, noise or vibration.

Where young persons or school age children (on work or other experience schemes) may be exposed to risk, their parent or guardian will be advised of the identified risks.



Work experience participants within the START TRAINING LTD will be under the close supervision of nominated staff with back up arrangements to ensure continued supervision at all times. These staff will ensure that work experience participants receive the necessary guidance, instruction and supervision to enable them to gain full benefit from this workplace placement.

Participants will be provided with an induction which introduces START TRAINING LTD Safety Policy, accident notification and reporting procedures, the defect reporting arrangements and the steps to be taken to ensure appropriate equipment and training are provided to meet the requirements of the programme. Young people participating in this programme must co-operate with the START TRAINING LTD in fulfilling its safe working practices. They must follow the directions provided by staff and the various operational procedures involved in the workplace. They will be advised that if in ANY doubt – they must ASK their supervisor for additional guidance.

START TRAINING LTD must be advised of any medical condition(s) likely to require special consideration whilst assessing the risk involved for the individual participants. In general the work experience programme will involve general business administration office activities, with additional stores, marketing or IT opportunities available. Work experience participants will receive induction training which includes both verbal and written evacuation instructions and information relating to the assessment of risk which will also be available to parents / carers.

TEMPORARY WORKERS:

The Health and Safety at Work Act 1974 and the Management of Health and Safety at Work Regulations 1999 apply to the health and safety of temporary workers employed by our business.

Except where the temporary worker is retained for short periods (e.g. one day or less), they will be given comprehensible information on the risks to their health and safety, including an induction covering the hazards of our business, emergency procedures and the management controls for those risks.

Temporary employees will be exposed to the complete range of risks to which other employees are exposed. They will also be unfamiliar with many of the procedures and will need extra supervision for a period after their induction.

Where the temporary worker is retained only for short periods they will be given information on emergency procedures, and will be continually supervised.

Responsibility for implementing this policy lies with the appropriate Line Manager concerned.

Arrangements and procedures for temporary workers

Agencies of temporary staff will be required to provide evidence that they have a safety policy as a matter of contract between our business and the agency. The policy must include a statement that their workers will comply with our safety procedures whilst on our sites.

Agencies of temporary staff will be required to provide evidence of employers' liability insurance.

We will provide the agency with details of risks from our activities to the health and safety of personnel supplied by them.

All agency or other temporary workers will be assigned to the supervision of a management member of the permanent staff.



Where personal protective equipment (PPE) is required and agreed with the agency, it will be provided at no less a standard than for permanent employees.

Where there is no agreement, the agency will be required to provide staff who bring their own PPE. This will apply, for example, to staff using display screen equipment bringing their own glasses if they need visual aids, or maintenance operatives bringing their own safety equipment commensurate with the need of the work they will be carrying out.

DRIVING:

Certain staff will be required to drive START TRAINING LTD or personal vehicles as part of their duties. Road travel is inherently hazardous and this statement sets out the START TRAINING LTD policy concerning vehicle use. The need for car travel must be justified; any unnecessary journeys should be avoided.

Staff driving on START TRAINING LTD business must hold a full licence for the class of vehicle involved. The START TRAINING LTD will check drivers' licences upon appointment of staff concerned and at twelve monthly frequencies thereafter. Staff have the responsibility to advise line managers and the HR of any convictions or loss of licence between these checks.

Any START TRAINING LTD, hire or staff's own vehicle must be suitable for the intended use. Staff making use of START TRAINING LTD or Hire Cars must familiarise themselves with the vehicle controls and characteristics prior to commencing journeys. In selecting such vehicles consideration must be given to the experience of the intended driver(s).

Prior to use and particularly where use is made of staff's own vehicles, the driver has the responsibility to ensure that the vehicle meets current Road Traffic Act requirements including insurance which extends to use in connection with the driver's employment. Whilst driving (at any time) the driver must comply with the requirements of the Road Traffic Act.

Drivers must take account of their state of health and any other factor which may affect their capability to drive safely. Vehicle driving must be avoided if taking any medication, prescribed or otherwise; if affected by alcohol or other substance(s) which may affect the ability to drive safely or if feeling unwell where this could affect ability. Staff must only drive (at any time) if fit to do so. If whilst driving staff become drowsy they must stop and take a break to recover before continuing. Any line manager or colleague believing that a member of staff is affected in any way likely to present a risk if driving must encourage the use of alternative arrangements.

In planning appointments etc, staff must allow sufficient time for the journey taking account of road and weather conditions.

It is START TRAINING LTD policy that drivers will not make use of mobile telephones whilst driving. Ideally a mobile telephone should be switched off whilst driving unless a passenger can take a call. Before making or answering a mobile telephone call a driver should stop and park safely.

If confronted by aggressive behaviour from other road users' staff should remain calm and must not respond to any challenge. Control must be maintained whilst attempting to slow or stop safely as may be appropriate. If stopping, remain inside the vehicle with doors locked and windows closed. Note any details which may assist should the situation escalate and it becomes necessary to report the incident.



Drivers should avoid driving or parking with START TRAINING LTD or personal / portable items on seats or rear parcel shelves. These are both hazards whilst driving, should an accident or emergency stop occur and present a temptation to theft. Doors should where practicable be locked whilst driving and windows open sufficient for ventilation. Drivers must remain alert to their surroundings at all times. Park in well lit areas and ensure vehicles are secured before leaving.

In certain cases staff may be required to transport members of the public. There are both safety and security considerations incorporated in these actions. The circumstances must, where practicable, be assessed prior to the situation arising. Where any known facts cause doubt regarding the safety of staff alternative arrangements should be made. Use of public transport may be more appropriate in some cases. Staff must not put themselves into positions of actual risk or situations enabling allegations to be made against them.

Antisocial or erratic behaviour in the confined space of a motor vehicle can endanger the driver and other road users. If staff encounter such circumstances they should endeavour to stop the vehicle as safely as possible and terminate the journey.

MOBILE TELEPHONES:

The long term health effects of mobile telephone use are not yet known. However there is some concern regarding exposure to the Radio Frequency (RF) radiation field generated around the device when in use. Safety considerations apply when driving, in proximity to certain electrical equipment, (hospitals and petrol filling stations) and whilst travelling on aircraft.

Current research (National Radiological Protection Board and International Commission on Non Ionising Radiation Protection) has indicated that the key issue dictating the level of exposure to RF radiation from mobile phones is the specific energy absorption rate (SAR). This determines the energy level absorbed by the body of the user and is dependent on the power output of the device. The Independent Expert START TRAINING LTD on Mobile Phones has recommended that an International Standard for SAR be adopted and that all equipment should be required to display the specification for comparative purposes.

START TRAINING LTD supply a limited number of mobile telephones to certain staff where a need is identified. It is START TRAINING LTD policy to attempt to supply equipment which, through the evaluation of published specification, is considered to be as low risk in terms of ill health effect as possible. Suppliers will be required to provide data regarding the radiation emissions which will be compared to information available to START TRAINING LTD from research into this issue. START TRAINING LTD will seek to further reduce the exposure through the issue of kits which enable the mobile telephone to be used away from the head. These "remote" ear and microphone kits may further reduce exposure – although reports have challenged this theory.

Staff making use of their own equipment are encouraged to seek information on regarding specification and consider the use of "hands free" kits. However the most practical approach is to limit both frequency and duration of use of mobile telephones as this will reduce any risk which might later be confirmed.

The carrying of mobile telephones near to the body should be avoided as far as is possible. The exposure to any electromagnetic or other radiation will be reduced if mobiles are carried in bags / briefcases etc. Where this is not practicable the position near to the body should be varied.



OUT OF HOURS WORKING:

The Health and Safety at Work Act 1974 and the Management of Health and Safety at Work Regulations 1999 apply to the safety of staff working on START TRAINING LTD premises out of normal office hours.

Staff who work long, irregular hours or at night may experience fatigue or disorientation. Line Managers are responsible for ensuring that staff are not in a position of working at times which cause them stress. Ample time off for rest and recovery must feature in the work patterns and the requirements of the Working Time Directive must be complied with.

Wherever possible, working at night will be voluntary. If pregnant workers or new mothers do not choose to work at night, they do not have to: we will provide them with alternative work, where necessary.

Line Managers are responsible to ensure that adequate supervision, fire evacuation and first-aid cover will be provided at all times for staff working out of normal hours. (In particular see reference to out of hours working in Premises Fire Safety)

Staff who work alone must follow the systems set up for reporting regularly to a designated person. Line Managers will ensure that if the work activity is anything other than low risk, lone working will not be permitted and adequate supervision will be provided.

LONE WORKING:

START TRAINING LTD recognises that some staff will, in the execution of their duties, be in the position of a "lone worker" from time to time. Consequently, as a responsible employer, START TRAINING LTD is aware that lone working may involves certain hazards and will use its best endeavours to implement measures which will control the associated risks to staff and others who may be affected by their undertakings. Lone working will be avoided where practicable when significant risk may result as a consequence.

Lone working results when a member of staff is working without close or direct supervision and without the availability of support from other staff. Managers must give consideration to the nature of the work activity, the environment in which the work takes place, the individual concerned and the level of supervision required.

The hazards to which personnel are exposed may well result in increased risks(s) if the worker has no support from others. Thought must be given to the possibility of accidental injury, illness, the possibility of exposure to violence (of whatever source), security issues and the potential for the making of allegations against staff.

Normal precautions will need to be taken as with normal working conditions and foreseeable emergency situations such as fire, first aid, equipment failure, violent or threatening behaviour and other security issues. Managers must determine if the workplace / activity presents special risk(s) to the solitary worker; can risk(s) or anticipated risk(s) associated with the job be adequately controlled by the person or are additional person(s) necessary; can any materials or equipment be safely handled by one person; will the presence or perceived presence of cash or valuable equipment increase the risk(s); is the individual medically fit and suitable for the task in a lone situation.

Consideration will need to be given to the work activity, and any likely emergency actions, to ensure that staff involved have received suitable and sufficient training and that appraisal has indicated a satisfactory level of performance. Training is particularly important where there is limited supervision capable of offering control, guidance and help in situations of uncertainty. This may be critical in the avoidance of



crisis in unusual or hazardous situations. Solitary workers need to understand the risk(s) involved in the work, the necessary precautionary measures and have experience to implement appropriate training.

Management will need to set clear procedures to establish what can and cannot be done whilst working alone. Such procedures will include references of when to stop working and seek advice from a supervisor.

Some examples of such circumstances may include:

- where only one member of staff is working in the premises, or parts of the premises, whether in normal working hours or not;
- Where a member of staff is visiting the premises of an employer;
- Where a member of staff is interviewing a member of the public;
- Where a member of staff is interviewing a member of the public at their home;
- Where a member of staff is travelling alone on business;
- Where staff may be working alone at home.

START TRAINING LTD will need to approach the management of risk to lone workers with equal diligence to that shown to any other member of staff.

Safe working systems will be established with Line Managers taking responsibility for ensuring that likely hazards have been identified and where necessary suitable measures implemented to eliminate or adequately control the risks. Line Managers should seek the advice of the Safety and Health Manager(s) as necessary.

For any staff required to work in solitary circumstances or without the support of supervision or other staff, their Line Manager will make an evaluation of the known, or likely, hazards and assess the risk(s).

Where appropriate line managers will need to establish arrangements for "safe working". This may involve communications prior to entry to a location and upon exit if some difficulty is perceived. The possession of "attack alarms" or mobile phone may be considered appropriate.

Other staff, or third party personnel, to support the worker, may be an option. At the very least

- Whereabouts
- reasons for and nature of activity
- Equipment in use and time of return should be known.

Contact should be maintained, as far as is reasonable possible, between staff and supervisors. Periodic communication is easily established through prescribed "call in" procedures (either land line or mobile communication).

Emergency procedures must be known and understanding demonstrated. Recognition of the hazards involved or likely to be involved, the attendant risks and control measures must be assured. For example this may include specific fire instructions; premises / property security issues; physical security; equipment / material use etc

AGGRESSION AND VIOLENCE AT WORK:

START TRAINING LTD is committed to high standards of Risk Management in all areas connected with business objectives. In recognition of this and the general duties under The Health and Safety at Work etc Act 1974 (Section 2) and the Management of Health and Safety at Work Regulations to provide safe



systems and places of work including adequate information, training, instruction and supervision, it is recognised that any actual or implied threat of violence to employees is wholly unacceptable. Consequently every effort will be made to eliminate or reduce to an acceptable level the risks to staff (and others) arising from aggression and violence at work.

Aggressive or violent behaviour, producing or capable of producing damage or hurtful effects, physical or emotional, on people at work can be defined as any incident in which an employee suffers abuse, threat or assault. Violence can take many forms including physical violence, verbal abuse and threats (with or without resort to weapons or other agents, rude gestures, innuendo and both sexual and racial harassment and incidents involving theft / robbery or damage.

In order to meet its obligations towards employees START TRAINING LTD is committed to the following policy.

Premises and activities will be assessed for security risks and wherever possible measures taken to reduce the opportunity for staff, premises or property to be affected by unsociable, threatening or criminal behaviour.

It is acknowledged that some measure of risk from aggression and violence faces employees in carrying out their responsibilities when meeting clients, members of the public, visiting locations outside START TRAINING LTD premises, whilst travelling in connection with these responsibilities or transporting valuable equipment or cash.

Actual or threatened assault on employees are totally unacceptable and Policy guidelines and training will be available to provide employees (and managers) with the necessary skills and procedures to enable aggressive and potentially violent encounters to be avoided where practicable or recognised and responded to in ways which reduce the risks.

It is recognised that certain staff may face a greater risk from aggressive or potentially violent behaviour. Managers will take account of circumstances and procedures to ensure that these risks are reduced to the lowest practicable levels if not eliminated. Where practicable an assessment of the risk associated with a visit to a location away from START TRAINING LTD premises will be carried out by the member of staff in consultation with the appropriate Line Manager. Visits will only be made where an alternative is impracticable. Where practicable visits will be arranged in the company of a colleague or associate from another agency. Where appropriate / requested, staff will be issued with a mobile telephone, "personal attack alarm" or other device as may be appropriate.

Detailed procedures are outlined regarding any START TRAINING LTD personnel working away from our premises in the "Outreach Staff" section of this Policy.

Unauthorised access to START TRAINING LTD sites should be prohibited by the security and Reception measures in place. However if these procedures fail and staff encounter any person who has no business on site they should, if necessary, exercise caution and seek the support of colleagues with a view to escorting the person off site. START TRAINING LTD Policy puts staff safety at a greater priority than material assets.

Staff travelling off site with valuable equipment i.e. lap top computers, mobile telephones etc will not leave such equipment unattended / insecure. However if threatened for the dispossession of equipment staff should comply with the demands made in an attempt to avoid violence.



Where possible observation of as much detail as possible will assist in the subsequent reporting of the crime.

START TRAINING LTD is committed to supporting employees who are subjected to aggression or assault in the course of their employment. The extent of the assistance will be dependant on individual circumstances / incidents. In all cases practical support will be considered. A positive staff welfare approach will be adopted with, where necessary, time off / guidance provided. Additionally legal advice may be available and where appropriate, representation provided. Support will have to be determined, initially, in the light of internal incident investigation, sufficiency of evidence and there being no conflict of interests. Where it is appropriate, and there is no conflict of interests, management may:

- subject to prior approval
- Indemnify employees against the cost incurred in bringing private prosecution.

Any member of staff involved in a situation which results in severe abuse, threat or assault whilst carrying out or in connection with their duties must report the incident at the earliest opportunity. The incident report available from the CEO should be forwarded to the appropriate manager through the immediate line manager.

The appropriate manager will consult with the Safety and Health Manager to ensure that, where appropriate, necessary notifications can be made and that the circumstances can be thoroughly investigated. Where necessary the company insurers will be informed.

A central file of violent incidents will be kept by the safety manager and information collated and analysed to aid procedural review and training needs.

It is important that staff are able to recognise, as quickly as possible, the signals that indicate potentially violent situations. Due to the way in which the START TRAINING LTD operates and the services that are supplied, each member of staff must do all they can to deflect and diffuse potentially aggressive incidents and to use their own skills and judgements to achieve this. However it is equally important for staff to summon help as soon as it is realised that an incident is beginning to escalate.

Staff have the right to terminate an interview, conversation or visit where any form of escalation of aggression puts them at risk from severe abuse, threat or assault. If possible the reasons(s) for this action should be stated.

This Policy and supporting guidelines will be reviewed as necessary in the light of experience. Management is committed to full consultation on all issues relating to health, safety and risk management.

SLIPS, TRIPS AND FALLS:

Slips, trips and falls due to poor housekeeping account for many workplace injuries. START TRAINING LTD safety policy clearly sets out accountabilities and responsibilities for good housekeeping, e.g. management responsibility for each area, for parts used in common and for the premises as a whole.

All employees will be expected to apply the following procedures, where appropriate. Any spillage or leakage of liquids (e.g. water or oil) or solids which may be liable to constitute a slip hazard must be cleaned as soon as it is safe to do so. Otherwise, the spillage/leakage should be reported to the

management.

The company will promote good housekeeping by positive supervision.



Materials will be properly stacked so that they are not liable to constitute a hazard.

Waste or surplus materials will be returned to a designated storage area or placed in a waste bin/skip and not left lying around to cause a hazard.

Materials must not be allowed to encroach onto designated pedestrian walkways.

Wall and floor sockets will be fitted to preclude excessive trailing cables.

Cables for equipment still fitted with plugs and leads will be properly routed and covered if necessary to reduce the probability of trip risks.

Routine premises cleaning will take place outside normal office/shop/business hours to reduce the risk of slips on wet floors or trips on trailing cables.

Dirty or contaminated floors contribute to the probability of slips, trips and falls. Cleaning operations can themselves add to the risk whilst they are in progress.

Floor treatment (washing, polishing, sealing, etc) will be applied to each surface compatible with that surface type, to prevent either slip hazards or surface deterioration.

Contract cleaning services and contractors undertaking treatment and maintenance of underfoot surfaces will be required to show that their employees receive adequate training, and are provided with the necessary information to enable all work to be properly and safely undertaken.

The system of work for all treatment and maintenance of underfoot surfaces will include the use of safety barriers and warning signs at all times, since employees, visitors or other contract cleaners need to be aware of the dangers.

Building / Site managers will ensure that any outdoor pedestrian routes on the site are regularly swept and, during icy/frosty conditions, are salted/gritted/sanded.

Slips, trips and falls due to poor floor surfaces are easily prevented, but may develop slowly due to wear, repeated minor damage, or faulty maintenance. Regular checks will take place as part of the ongoing safety inspections by appropriate Safety Managers and Safety Representatives

Underfoot surfaces will be provided that are suitable for:

- The environment where used (e.g. indoors/outdoors)
- The work activity and type and amount of traffic (pedestrian, works vehicles, hand trucks, etc.).
- Underfoot surfaces will be maintained in good condition and free from damage and unevenness.
- Small changes in the level of walking surfaces, such as slopes, steps, ridges or unevenness, will be
 eliminated where reasonably practicable, or have adequate lighting to reduce shadows, etc. They
 will be marked, if necessary.
- Where storage racking is provided access steps will be used to access the higher levels

PHYSICAL MOVEMENT / MANUAL HANDLING:

Poor physical movement or manual handling activities can result in acute injury or chronic ill health as well as potential damage to materials and equipment. Attempting to access a low drawer or racking - below waist level or high positions — above shoulder height (regardless of the weight, shape etc of the load) can lead to strained muscles etc. Lifting or carrying loads can significantly increase the risk of injury or ill health. Where more substantial manual handling operations are involved the risk of acute injury or cumulative physical damage is increased.

All employees should be aware of the need for care in general movement and have a responsibility not to put themselves at risk. A guidance note on movement and handling is attached.

Manual Handling Operations Assessment is appropriate within the START TRAINING LTD. Departments or specific posts identified as higher risk include those involved with stores / mail activities, furniture or departmental records movement / archive, Information Technology, Marketing activities and, specifically –



replacement of drinking water bottles. However all employees are encouraged to take note of START TRAINING LTD Policy and guidance in relation to movement and handling. This strategy which will be implemented throughout START TRAINING LTD premises / operations. These measures will include the following arrangements, procedures and controls:

- The manual handling of loads likely to present risk to employees will be avoided.
- where the manual handling of loads is unavoidable Line Managers and staff must assess the overall task (the Safety and Health Manager is available for guidance) if appropriate contractors will be used for major handling activities, materials will be delivered to points of use, loads will be broken down to manageable units and mechanical assistance utilised (trucks and trolleys).
- Individual capabilities will be taken into account employees will assess the load characteristics (weight, bulk, size etc) the assistance of a colleague may always be sought and staff will retain the right to decline to carry out a manual handling operation.
- Where considered appropriate protective equipment, gloves, work wear and footwear may be required. This should be sought via line managers.
- Employees in the Departments or posts identified as high(er) risk will be trained in good movement and handling techniques. Line Managers will ensure that staff have received appropriate training and implement safe working practices in relation to manual handling.
- Only employees trained in manual handling operations will be required to lift / carry loads in connection with their work. Untrained employees will not move furniture, transit / archive crates or boxes. Line managers will ensure that staff do not undertake lifting / carrying activities for which they have not been trained.
- Employees will indicate to line management any medical or other condition which is likely to affect their capability to undertake manual handling operations.
- The planning of load movement involving trucks and trolleys must take account of flooring condition, carpets, inclines, steps and doorways. Sufficient staff must be involved to ensure the safety of the operation and others who may be exposed to the operation.

Any movement of furniture (other than chairs) should be left to designated personnel (who have been trained in good handling techniques) or contractors. Removal crates should not be moved by staff and should be stacked /filled with consideration for those who will have to move them. They should not be overfilled. Similarly staff using "Hot Desk" facilities must not overfill their "boxes etc" and must take account of storage and transporting these so as not to put themselves at risk. Future office planning and equipment will seek to resolve this issue in a more practicable way.

WORK AT HEIGHT (Needing access equipment):

Work requirements within START TRAINING LTD premises which involve activities at any height above floor surface will be avoided as far as possible and contractors will be employed. However where this activity cannot be avoided and START TRAINING LTD personnel are involved a strict operational procedure will be followed.

A purpose built "step up", ladder or step ladder will be utilised for access and for work of short duration only. Where electrical work is undertaken the ladder / step ladder will be of wooden or glass fibre construction.

Prior to use staff will visually inspect a step ladder / ladder for defects and will not use any equipment found to be faulty. This will be taken out of service and either repaired or destroyed, via management.

Assistance will need to be sought when carrying a ladder on START TRAINING LTD sites. Other staff safety must be considered.



If using a ladder, this must be set at a safe "angle" (75 degrees) on firm stable ground and secured by someone "footing" whilst a more secure anchorage may be achieved. Both hands must be free for climbing / descending a ladder – any equipment should be raised separately. One hand must always be free to hold on to the ladder. Ladders will be moved to prevent over reaching.

Where ladders or step ladders are in use the area will be "cordoned off". There will be no staff working below any work at height.

A step ladder should be climbed only so far as it still presents a hand hold for the user. However step ladders provide little side way stability and assistance may be required for additional support.

Scaffold or trestles must be used for work of longer duration or to provide additional stability. Safety and Health Managers should be asked for guidance.

Foot wear should be checked for any fault or contamination which may cause a slip or trip. Staff feeling unwell; those who may be pregnant; those with a fear of height or any staff taking medication which may affect balance - will not undertake any work above ground level.

TRANSPORTING CASH:

It may be necessary for START TRAINING LTD personnel to draw cash from Banks and /or transport cash in connection with START TRAINING LTD business – for petty cash or funds to refund client travelling expenses etc.

Wherever possible this activity will be avoided through bank transfer procedures. Where the practice cannot be avoided arrangements will be made for staff drawing and / or transporting cash on company business to do so with the support of at least one other member of staff. It will be the practice to vary the staff undertaking this task, and as far as possible they will travel by different routes, at different times and on different days so as to avoid the setting of a recognisable pattern.

Reference should be made to START TRAINING LTD on aggression and violence and supporting Guidance Note. Whilst compliance with this policy will significantly reduce the likelihood of criminal action against staff, this policy puts staff safety at a greater priority than material assets. Any threat or attack with the intention of robbery should be met with as much calm as possible under the circumstances and staff should comply with the demands made.

Where possible observation of as much detail as possible will assist in the subsequent reporting of the crime.

OCCUPATIONAL ILL HEALTH:

START TRAINING LTD will take all reasonably practicable measures to prevent our employees from contracting any occupational disease (- noise induced hearing loss, certain skin conditions and muscular skeletal disorders, lung diseases and certain biological infections)

START TRAINING LTD will, through Line Managers, provide staff with information on any occupational diseases associated with their work activity, where relevant.

The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR) require us to report certain diseases to our enforcing authority.

Any employee who notices any of the symptoms of, or is diagnosed by a doctor as having, any relevant occupational disease must report this to their Line Manager / Supervisor and appropriate HR Officer.



Managers and supervisors must report any occurrences of occupational diseases to the Safety and Health manager. The Safety and Health manager will report all cases of reportable diseases to the enforcing authority.

If an occupational disease is contracted, wherever possible we will take steps to protect the employee against further exposure while keeping them in their normal job. If this is not possible, we will try and offer the employee suitable alternative work.

STRESS POLICY:

The effect of stress on performance is well established and in the interests of both the employees and efficiency, it should be minimised.

Employees are encouraged to seek assistance from Line Mangers and HR if they believe that they have a problem with stress.

Line Managers and staff in general must be alert to staff and colleagues who display signs of work related stress which is adversely affecting behaviour or performance. Loss of temper, irritability, difficulty in taking decisions, complaints of palpitations, fainting, dizziness, sweating, lack of appetite, nervous twitching and trembling, stammering, insomnia, persistent tiredness, etc.

Staff experiencing frequent feelings of - depression, irritability, lethargy and exhaustion, anxiety, dissatisfaction, difficulties relaxing, nail biting, excessive alcohol consumption; heavy smoking, etc. should seek assistance from their own GP. Other assistance may be available through the Occupational Health Advisor.

START TRAINING LTD and Line Managers have a responsibility to organise workplaces and work tasks and workloads giving consideration to the effect upon staff.

Confidential stress counselling may be arranged in addition to the personnel procedures for assisting in the resolution of stressful work situations. This is not intended to be a substitute for solving the situations.

Confidential support may be available for employees suffering from clinically diagnosed conditions, e.g. depression, although this is not to be used instead of medical or psychiatric advice.

The Occupational Health Advisors may advise on stress risk assessments and make recommendations for stress control and reduction.

SMOKING POLICY:

There is evidence to suggest that both the direct and passive inhalation of tobacco smoke can adversely affect health.

In support of START TRAINING LTD's Health and Safety Policy, its commitment to providing a comfortable working environment and promoting Health and Safety awareness, smoking is prohibited in all common work areas, toilets, corridors, Reception, store rooms, kitchens, rest and recreation areas, meeting rooms and training rooms of START TRAINING LTD premises.

Smoking area's will be provided outside of START TRAINING LTD buildings.

During meetings in non-smoking areas, those involved should arrange "comfort breaks" for participants as appropriate.



Smokers are responsible for exercising care in the safe disposal of matches and all other waste from smoking activities. Smokers leaving designated areas must check that combustion from their activities has ceased and that the area is safe. Smokers must attend a lighted cigarette etc at ALL times. If leaving a designated area all smoking material must be extinguished.

In the interest of health smoking and exposure to tobacco smoke should be avoided.

ALCOHOL AND DRUGS POLICY:

Alcohol and drug abuse have serious implications for users, their families, for their work and work colleagues.

Employees are encouraged to seek assistance from Line Managers and HR support if they believe that they have a problem with alcohol, drugs or other substances.

Managers are required to make a note of employees who show symptoms of alcohol or other intoxication when at work. These symptoms include:

- Smell of alcohol
- slurred speech
- Unusual lack of co-ordination
- Changes in behaviour, particularly aggressiveness.

Alcohol may only be consumed on the premises during specified functions.

Anyone found taking alcohol or drugs on the premises without prior authorisation is guilty of gross misconduct, and will be disciplined accordingly.

Anyone found to be significantly intoxicated by alcohol or drugs on the premises will be removed, guilty of gross misconduct and disciplined accordingly. Similarly anyone supplying drugs on START TRAINING LTD premises or during START TRAINING LTD time will be guilty of gross misconduct and disciplined accordingly.

HEALTH AND SAFETY MANAGEMENT OF TRAINING CONTRACTS:

START TRAINING LTD will comply with both the legal and contractual requirements of The Learning and Skills Council in regard to the health and safety management of training contracts.

Procedures will be implemented to manage the health and safety aspects of START TRAINING LTD contracts with Suppliers, Providers and Employers.

Prior to entering into a contract with a Supplier / Provider a proposal containing sufficient safety management statements will be evaluated by the appropriate Safety and Health Co-ordinator who will advise contracting staff on the suitability of H&S control. A Health and Safety Risk Banding will be set according to the occupational sector(s) involved and the Organisational capability of the Supplier / Provider. Upon recontracting where no significant changes have been made to the training provision and satisfactory performance of the previous contract relative to health and safety management is evident a check will be made regarding current staff competency for health and safety responsibilities.

Prior to Direct Contracting with an Employer, appropriately trained staff will conduct health and safety vetting (appraisal) visits to establish the capability to provide quality training in circumstances where health and safety is adequately managed. A sample of these reports will be assessed by the appropriate Safety and Health Manager with additional support and advice being provided where necessary. The Safety and Health Coordinator(s) will be responsible for overview of the health and safety monitoring strategy.



Audits of safety management systems and monitoring of the safety and health compliance of training contracts will take place at appropriate time and frequencies. Additional monitoring and audits to that scheduled will be undertaken in response to accidents, poor performance found whilst monitoring or auditing and changes in trends and legislation. The development and spreading of good practice and attention to necessary remedial action will result.

The appointed Safety and Health Managers may carry out sample monitoring and audits of START TRAINING LTD contracts in addition to the Quality Assurance Audits and Contract Manager's monitoring, paying particular attention to occupational High Risk Suppliers.

Where standards of Safety management on programmes fail to maintain those required by the START TRAINING LTD, the Contract Managers will be advised by the Safety and Health Manager(s) and they in turn will take appropriate action.

The Safety and Health Managers will establish and maintain contact with the Enforcing Authorities, Health and Safety Executive, Local Environmental Health and Fire Authority. Liaison will also be maintained with the Regional Safety Adviser appointed by the Learning and Skills Council.

The Safety and Health Co-ordinator(s) will cascade Health and Safety information from time to time, to programme Delivery Staff and to Training Suppliers.

PARTICIPANT ACCIDENT INVESTIGATION:

START TRAINING LTD Safety and Health Managers(s) will conduct investigations of accidents involving students and learners in receipt of training allowances. These investigations will, where necessary, protect the interests of the trainee relative to the DIUSE Industrial Injuries Scheme. The investigation of accidents will ensure compliance with legislation and will ensure that appropriate action is taken in an attempt to prevent recurrence.

VISITORS TO START TRAINING LTD SITES:

The Health and Safety at Work Act 1974, Management of Health and Safety at Work Regulations 1999 and Occupiers' Liability Act 1957 apply to visitors on our premises.

Our policy regarding the control of visitors on our premises is as follows:

We must be aware that the visitor is on our premises.

Security locks will prevent unauthorised access.

Our Visitors' Rules follow this section and should be explained to our visitors on their arrival.

As far as possible, visitors will be accompanied by an employee. Visitors will not be permitted to wander freely around working areas. This is important for safety and security reasons.

Should a fire occur the person who is accompanying the visitor will take him/her to the fire assembly point. Should an incident occur involving the visitor which results in injury, this will be recorded in the Accident Book and a thorough investigation carried out as soon as possible.

If the injury is of a serious nature or is fatal, the incident must be reported to the enforcing authority and the company's accident reporting system must be followed.

All visitors must:

- follow the fire procedures displayed on the premises
- adhere to any 'no smoking' controls



- park their vehicles in such a way as not to obstruct fire escape routes, roads, access or other vehicles
- Either be accompanied or authorised to enter the premises
- remain within authorised areas and must not enter any restricted areas unless accompanied
- Not take anything from the premises without permission
- report all incidents and/or injuries to the host
- Wear protective clothing, which will be supplied when necessary.

EXTERNAL CONTRACTORS:

The Health and Safety at Work Act 1974 and the Management of Health and Safety at Work Regulations 1999 impose duties to safeguard the health and safety of those who are not in our employment, but who may be affected by our business activities. These duties also apply to a contractor on the premises, in respect of safeguarding our employees from "his" activities.

Electricians, IT and Telephone contractors, cleaners, window cleaners, pest control operatives, premises and equipment maintenance / service contractors, materials and equipment suppliers and plant care attendants are all likely to carry out work on START TRAINING LTD premises.

We will endeavour to employ only competent contractors, who will be selected according to our specifications, including satisfactory replies to requests for safety management confirmation, risk assessments and method statements where appropriate.

No work likely to affect START TRAINING LTD staff will be allowed to begin until a work method statement has been supplied and approved by the Estates Manager or Site Manager. Where necessary the Safety and Health Manager will assist in this process.

One of our main duties is to ensure adequate co-operation between START TRAINING LTD and the contractor. No contract will commence or continue unless the appointed Manager / Site Manager is in liaison with the contractor as they will be responsible for seeing that scheduled work is undertaken - seeking guidance from the Safety and Health Manager(s) where necessary.

Where contractors do work on START TRAINING LTD sites they will be allocated the work area which will then become their responsibility and will where necessary be cordoned off to prevent unauthorised access by START TRAINING LTD personnel and students. No work will take place above or in a position likely to affect START TRAINING LTD personnel. Whilst the manager / Site Manager is responsible for co-ordinating contractors, staff and line managers must also take account of contractors on site and report any concerns seeking advice from Health and Safety managers as necessary.

Repairs, refurbishment or other works of construction may involve compliance with additional regulation (Construction Design and Management Regulations) and the Safety and Health Managers should be consulted to ensure compliance. In almost all cases such works will be conducted by external contractors

Premises and equipment service / maintenance will be conducted in accordance with equipment specification provided by Suppliers.

START TRAINING LTD recognises the duties imposed by current legislation on both START TRAINING LTD and any contractor employed to conduct work on company premises / sites.

GENERAL USE OF TOOLS:

The selection of inappropriate tools or equipment, lack of pre use inspection, repair or maintenance, incorrect use and storage can significantly increase the risk to users and those who may be exposed to this use.



Line Managers are responsible for ensuring that staff are provided with the appropriate equipment, including tools, to carry out their work for START TRAINING LTD and that they have the competence to carry out this work in safety.

Staff must check that equipment is suitable for use through a visual pre use inspection and avoid using anything appearing faulty until remedial action has been taken. Any faulty equipment or tools must be withdrawn from use and destroyed or secured to prevent any inadvertent use by others.

Where power tools or other electrical equipment is used with trailing cables, attention must be given to the safe routing of the cable. Cables should be as short as possible to minimise trip hazards. However if using "drum" extension leads, steps must be taken to prevent these overheating. Ideally where current demand is high they should be "run out" to prevent induction heating.

Users of tools and equipment are responsible for ensuring that all safety devices and guards are fitted and operating prior to use. Electrical equipment must be disconnected from power supply before making any adjustments. Faults must be reported immediately. Any necessary personal protective equipment must be used. Tools and equipment must be returned to appropriate safe storage following use.

Line Manager(s) / supervisors are responsible for overseeing staff activity and that safety procedures are observed.

CATERING:

To minimise the risks associated with a range of issues connected with food preparation it is START TRAINING LTD policy to use the refectory arrangements for onsite functions or hire in arrangement from reputable agencies when the latter is not practical.

START TRAINING LTD sites will have "kitchen" facilities. These will incorporate a range of equipment for staff use – refreshment breaks / lunch etc. Whilst these areas will be included in the work detail of office / site cleaners staff using these facilities will be responsible for their upkeep throughout the day. Spillage must be cleaned up at the time whilst keeping work tops, utensils etc clean. Materials stored in refrigerators must be checked for condition and destroyed when necessary.

Use of microwave ovens must be in accordance with operating instructions and any faults must be reported as soon as they are identified. All Kitchen equipment must be cleaned following use.

Kitchen equipment will be covered by the work equipment policy and will be incorporated into the electrical appliance testing regime. Additionally microwave oven seals will be tested annually following the year of purchase.

EXHIBITIONS – PUBLIC MEETINGS / EVENTS:

The arrangement of offsite exhibitions, promotional events, public meetings or other events will be the responsibility of those organising such events – Departmental Manager etc. The selection of venue will take account of the need and purpose of the event and will require an evaluation of the safety management arrangements, including those for emergencies – fire, accident / ill health etc.

The transportation and setting up of exhibition, or other event, stands and materials will be contracted to agents. Similarly any specialist equipment, catering or security need will be supplied / operated by competent contractors.



EMPLOYEES PLACED WITH HOST EMPLOYERS:

Students, Learners or Trainees or other staff employed by START TRAINING LTD may be placed with and work for Host Employers due to it not being possible to deliver the work experience / training within the START TRAINING LTD, or upon secondment. In these cases they will be subject to additional health and safety management arrangements.

Where the START TRAINING LTD employs Student / Learners to work / train at locations outside the operational control or responsibility of START TRAINING LTD and where the student / learners are engaged in occupational areas outside the normal operational activities of the START TRAINING LTD, companies will be identified with the capability to provide the necessary work / training opportunity and the necessary structure and arrangements to manage the health, safety and welfare requirements.

In such cases, as the day to day direction of the student / learners and their activities is beyond the control of START TRAINING LTD, a contract will be entered into which incorporates appropriate Health and Safety clauses - between START TRAINING LTD and the Placement Company.

A Safety and Health Co-ordinator from the START TRAINING LTD will consult with the appointed person, for health and safety management, within the Placement Company to assess the safety management arrangements prior to the commencement of such a contract.

Students / learners will be subject to the requirements of both the START TRAINING LTD and the Placement Company Health and Safety Management Policies.

Throughout the duration of the contract the Placement Company will be responsible to the START TRAINING LTD for the Health, Safety and Welfare of the student / learners placed with them. Notwithstanding the terms of the Placement Company's own Health and Safety Policy the Placement Company will implement appropriate arrangements to ensure that, where applicable, the START TRAINING LTD's Policy is implemented.

During the duration of the contract risk assessment visits will be conducted, regularly, at points of work / training as deemed necessary by START TRAINING LTD Safety and Health Co-ordinator.

Any necessary action will be raised with the Placement Company's appointed person for health and safety with appropriate steps being taken to eliminate or reduce risk as required.

Similarly any START TRAINING LTD Staff undertaking periods of secondment with another employer will be responsible for complying with both this and the policy of the Host Employer.

Actual Date	Reviewed by	Next review planned for
25 th August 2009	Narmin Hugill	2011
15 th May 2011	Narmin Hugill	2012
6th February 2012	Narmin Hugill	2013
12th May 2013	Narmin Hugill	2014
15th January 2014	Narmin Hugill	2015
16th February 2015	Narmin Hugill	2016
10th October 2016	Narmin Hugill	2017
18th April 2017	Narmin Hugill	2018
20 th October 2018	Esu Hill	2019

