

Health and Safety at Work Act 1974

Health and Safety Policy and Procedures

of

Rochdale Training

Fishwick Street
ROCHDALE
OL16 5NA

Review Date/ Reviewed By:	February 2022	J Roberts
	April 2023	J Roberts

Next Review Date:	April 2024
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Overview of Health and Safety Policy

The General Statement of Health and Safety Policy (P5 – signed by our CEO and Chairman) embodies the overarching principles, systems and procedures to ensure the health and safety and wellbeing of all employees, apprentices and learners in our care. The management and review of health and safety is overseen by the Board and our CEO – as well as our Health and Safety Manager with recourse to our External H&S Competent Person - both of whom are appropriately qualified and experienced in all sectors within our training remit.

In terms of promotion of the policy to all staff and learners, health and safety is a major agenda item at monthly senior management team (SMT) meetings. This ensures we manage and identify health and safety concerns. Health and safety actions, initiatives, campaigns and procedures are cascaded to staff and learners via team meetings which in turn serve as a conduit to raise concerns to SMT or immediately via the Health and Safety Manager. Our communication and promotion of the health and safety policy is on P16. We promote joint consultation on all health and safety issues. All learners are encouraged and reminded of their duty to report potentially unsafe practices both at Rochdale Training and at their employer premises.

Commitment to the Health and Safety policy is assured by regular communication to staff and learners, unannounced audits and regular review of health and safety arrangements with our employers. A full Health and Safety Appraisal of the employer premises and Apprentice working environment is conducted before an Apprentice starts their qualification. Learners are regularly questioned at reviews about any accident, incident, near miss or health and safety concern at their company.

Our safety training is detailed on P16-17. New health and safety policies and training for all affected persons are implemented and incorporated into the Health and Safety Policy as needed, such as the Lockdown policy and Anti-Terrorism policy (including Run, Hide Tell) P18-24. Care and cooperation is integral to building and maintaining a healthy and safe working environment to safeguard the apprentices in our care - as detailed on P16.

In terms of designated responsible people for health and safety, the Health and Safety Manager is NEBOSH qualified with over 10 years' experience in the role. We also consult with an external Health and Safety Competent person (CMIOSH, FIIRSM & MCIEH). This ensures concerns are identified promptly and proactively – then managed, addressed and lessons learnt communicated to all staff and learners. It also ensures continuous improvement planning & monitoring, following the Plan Do Check Act process in line with best practice ISO 45001, effective organisation and review of our Health and Safety performance and compliance to the applicable legislation.

In terms of a procedure for accidents or ill health of apprentices our first aid arrangements and first aid measures policy are detailed on P13 and 31-32. Accident statistics are compiled continuously and reviewed at Board meetings – focussing on trends by sector, sections within the workshop/employers' premises and actions/lessons learnt from any RIDDOR reportable investigations.

Review of Risk Assessments & the Health and Safety Policy is carried out at any point where a significant occurrence or new legislation necessitates review and updating of the policy, otherwise it is done annually and ratified by all members of SMT. Last review date is April 2023 and next review is April 2024.

Overall responsibility for Health and Safety on a day to day basis of Rochdale Training is Jeremy Roberts (NEBOSH, TechIOSH), jroberts@rochdaletraining.co.uk - 07860 919378

GLOSSARY OF TERMS USED IN THIS POLICY

TERM	MEANING
ACM	Asbestos containing material or product including items that have been contaminated with asbestos fibres
ACOPs	Approved Code of Practice. Practical guidance to aid compliance with a Statutory requirement. Compliance with the Law is achieved by complying with the ACOP.
Audit	A systematic comparison of the practice of a procedure or process with the with its Policy description and any legal requirements to determine compliance.
Competence	The level of skills, knowledge and experience necessary to adequately fulfil a particular role in the discharge of an employer's responsibility.
Contractor	Anyone employed by the Company who is not an employee of the Company (by virtue of a Contract of employment) but is working on the premises or, on behalf of the company, on client premises to deliver a service as described by a Contract (written or verbal) or a Purchase order.
DSE	Display Screen equipment. Term used to describe computer based equipment that forms a Computer Workstation entailing a key board, processor, screen, printer etc.
EH40	Workplace Exposure Limits - An annual publication from HSE listing the limits of exposure to specific airborne hazardous substances.
GUIDANCE	Information provide with legislation to aid compliance.
HAZARD	Anything with the potential to cause harm.
HPD	Hearing Protection device – ear defenders plugs etc - hearing protection.
HEALTH SURVEILLANCE	Formal systematic and specific medical examination of employees exposed to a hazard in order to identify any symptoms of ill health and the failure of any current control measures.
HEIGHT	Any place not at ground level that can be below ground level from which a person could be injured in a fall.
INDUCTION SYSTEM	A formal training input designed to familiarise a new employee with basic knowledge, including health and safety issues, necessary to employment within the Company.
INSPECTION	Visual observation of a process, activity, environment or document to identify whether compliance with accepted practice and procedures is being maintained.

TERM	MEANING
LEV	Local Exhaust Ventilation – an engineering control designed to remove harmful airborne contaminants.
LOSS EVENT	Anything that has occurred as the result of a failure of a safety system, procedure or control measure.
LEARNER	Any person receiving instruction, training, work practice, work shadowing, work experience or skills development or work who is not an employee of the Company but may be a school pupil, student, employed or self-employed trainee, learner on a Government funded scheme
MONITOR	Ongoing inspection and/or audit of a process, activity, environment or recording system to ensure compliance with documented procedures and RCS.
PPE	Personal Protective equipment. Apparel required to provide protection of an employee from a hazard.
PAT	Portable appliance testing – a test format conducted by a competent person using PAT testing equipment
PERFORMANCE REVIEW	Systematic analysis of health and safety related records and data to identify areas for improvement of existing health and safety arrangements
RISK	The likelihood that the harm from a hazard will be realised and the severity of that harm
RISK ASSESSMENT	The formal assessment and evaluation of the effect of a hazard taking into account existing control measures.
RISK RATING	A specification for evaluation of the level of risk from a hazard that may be qualitative – High, Medium, Low or quantitative – a Risk rating number derived from rating scales for the risk characteristics
RIDDOR	The Reporting of Injuries, Diseases and Dangerous Occurrences regulations 1995
RCSs	Risk control systems – the measures put in place to prevent or at least control exposure of employees to hazards
RPE	Respiratory Protective equipment a device to prevent entry of a hazardous substance by inhalation
SFA	Skills Funding Agency
SUBSTANCE	Any material as a solid, liquid, vapour, mist gas, fume that may be a chemical or biological agent
WORK PLACE	Anywhere an employee is required to work
WORK EQUIPMENT	Any item or tool used in the

General Statement of Health and Safety Policy

It is the Policy of Rochdale Training Association Limited, (hereafter referred to as the Company) to comply with the terms of the Health and Safety at Work etc. Act 1974 and all relevant Health and Safety legislation and to provide and maintain a healthy and safe working environment for all persons who may be affected by its activities.

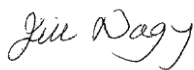
The Health and Safety Objective of the Company is to minimise the number of instances of occupational accidents and illnesses and ultimately to achieve an incident-free workplace by:

- Promoting a health and safety culture throughout the organisation
- Providing procedures, systems of work and work equipment that presents minimum risk to employees, learners and any other person
- Creating and maintaining a healthy and safe workplace for all employees, learners and others
- Communicating information to employees, learners and others in relation to safe working practices
- Continuously improving health, safety and welfare for all learners and employees
- Promoting joint consultation on all health and safety issues.

The Management of the Company recognises its responsibility to ensure that the Company's equipment, materials, procedures and systems of work are made as safe as is reasonably practicable through careful planning, effective organisation, continuous monitoring and review of the Company's health and safety performance.

While the Management of the Company will do all that is within its powers to ensure the health, safety and welfare of any person that its activities may affect, it is recognised that health and safety at work is the responsibility of each and every individual associated with the Company. The Management will provide all employees, learners, visitors, contractors and others with the information, instruction, training and supervision necessary to maintain their health and safety. However, it is the duty of each individual to take reasonable care of their own health, safety and welfare and that of others and to report any situation that may pose a threat to the well being of themselves or any other person.

The Company's Health and Safety Policy will be continually monitored and updated, particularly when changes in the scale and nature of our operations occur and, in any event, the whole of our Health and Safety Management system will be reviewed and updated at least every 12 months. The specific arrangements for the implementation of the policy and the personnel responsible are detailed below.



Signed:

Title: Chief Executive

6th Jan 2023

Date



Signed:

Title: Chairman

6th Jan 2023

Date

Section 2 Organisational Arrangements:

The Chief Executive

The Chief Executive will ensure that,

1. There is an effective policy covering all aspects of Health, Safety and Welfare in relation to employees, learners, visitors, contractors, clients and members of the public who may be affected by the Company's activities and that it is reviewed at least annually and amended as necessary to ensure its continued effectiveness.
2. Sufficient resources (Financial, Physical, Human, Specialist expertise, Administrative, Time) are made available to effectively implement the Health and Safety Policy.
3. Employers Liability, Public Liability Insurance and any other insurance arrangements are maintained that adequately cover the Company's liabilities to employees, learners, contractors, visitors, and members of the public in accordance with legislative requirements.
4. Recommendations arising from any report issued by Fire and Rescue Authority, HSE, Insurance Company, Health and Safety Consultant or Competent person's recommendations in relation to investigations or audits carried out into health, safety and welfare matters are implemented without due delay.
5. Any developments in Health and Safety legislation, documentary guidance and codes of practice are effectively implemented at the Company within any specified time limits.
6. The Health and Safety Policy, and any revisions thereof are effectively communicated to all the employees, learners and to any other persons where it is in the interests of their health, safety or welfare that the whole policy or relevant parts of it are so communicated.
7. Competent assistance is appointed as necessary to provide professional expertise towards the achievement and maintenance of legal compliance and the minimisation of losses through any failure of the Company's health and safety arrangements.
8. Health and Safety audits effectively monitor the Company's health and safety performance against documented systems and procedures and legal requirements.
9. Work procedures are planned, organised, monitored and continually reviewed to minimise risk.
10. Work practices are assessed for risk and steps taken to effectively minimise risk as far as is reasonably practicable.
11. Working conditions are maintained that, at the very least, meet any standards established by legislation and Approved Codes of Practice and, where reasonably practicable, exceed them.
12. Employees, learners and others receive any information, instruction or training as is necessary to fulfil the requirements of the Health and Safety Policy, that appropriate records are maintained and that the effectiveness of any such training is evaluated.
13. Any accidents, dangerous occurrences and ill health (including stress) arising from the Company's work activities are investigated, correctly documented and formally reported (including those under RIDDOR) and records are maintained.
14. Recommendations arising from an Accident Investigation Report are implemented without due delay to prevent any recurrence.

15. All employees of the Company and learners co-operate fully with HSE, Environmental Health, Insurance Company or other officials in relation to health, safety and welfare matters.
16. Any new equipment brought into the Company is examined to ensure that it is CE marked, is compliant with relevant standards including the essential health and safety requirements and is safe to use when correctly used.
17. Any developments in Legislation, Codes of Practice, requirements, official guidance or changes in conditions, procedures or practices communicated by the external competent assistance are implemented and are effectively communicated to those employees that it affects.
18. Contractors are assessed and informed of the Company Health and Safety Policy requirements prior to contract.
19. Any health and safety matters arising from the Health and Safety Committee meetings, incident reports etc. are brought to the attention of the Executive Committee at the 2-monthly meeting.
20. Criminal Records Bureau certification is in place for all staff, contractors and subcontractors employed by the Company.

Engineering Manager

The Engineering Manager is responsible for the Engineering Training function including the activities of Tutors and Engineering/Manufacturing training of learners in client companies and all the activities of the Company Engineering Training Centre.

The Manager ensures:

- 1 The allocation of resources (Financial, Physical, Human, Specialist expertise, Administrative, Time) to effectively implement the Health and Safety Policy.
- 2 New staff and learner Induction Training is carried out and recorded in accordance with procedures.
- 3 Employees, learners and others receive any information, instruction or training as is necessary to fulfil the requirements of the Health and Safety Policy, that appropriate records are maintained and that the effectiveness of any such training is evaluated.
- 4 Instructional staff and Engineering Tutors are provided with appropriate levels of health and safety training to enable them to fulfil their roles effectively.
- 5 Communicates the Health and Safety Policy and procedures, and any revisions thereof to his staff and to any other persons where it is in the interests of their health, safety or welfare and that this is disseminated to those that it may affect.
- 6 Implements the recommendations of any report issued by Fire and Rescue Authority, HSE, Insurance Company, Health and Safety Consultant or Competent person's recommendations in relation to investigations or audits carried out into health, safety and welfare matters within the Engineering training function without due delay.
- 7 Examines, in conjunction with the Chief Instructor/Engineering Manager, any new equipment brought into the Training Centre to ensure that it is CE marked, is compliant with relevant standards including the essential health and safety requirements and is safe to use when correctly used.

- 8 Notifies the Health and Safety Manager of any new substance (e.g. solvent, paint, oil, cleaning agent) identified as hazardous to health and that this is formally assessed prior to use.
- 9 Any developments in Health and Safety legislation, documentary guidance and codes of practice are effectively implemented within the Engineering Training function within any specified time limits.
- 10 Notifies to the Health and Safety Manager and records any accidents, dangerous occurrences and ill health arising from the Company's work activities.
- 11 In conjunction with the Health and Safety Manager, investigates these incidents as required.
- 12 Reports to the Health and Safety Manager any concerns regarding health, safety or welfare in relation to his staff and any learners within the Engineering Training function without due to delay as this may impact upon the validity of any risk assessment.
- 13 Provides First Aid cover within the Training Centre.
- 14 Monitors the activities of any contractor working within the Training Centre as such activities may impact upon the health, safety or welfare of those working in this area and takes appropriate action on unacceptable health and safety performance.
- 15 Daily/Weekly workshop inspections are conducted in accordance with procedural requirements.

Business Department Manager

The Business Department Manager is responsible for the Business Administration Training function including the Business Administration Training Centre and IT facilities and the activities of Business Administration Tutors working with learners within client companies.

The Manager ensures:

- 1 Allocation of resources (financial, physical, human, specialist expertise, administrative, time) to effectively implement the Health and Safety Policy.
- 2 New staff and learner Induction Training is carried out and recorded in accordance with procedures.
- 3 Employees, learners and others receive any information, instruction or training as is necessary to fulfil the requirements of the Health and Safety Policy, that appropriate records are maintained and that the effectiveness of any such training is evaluated.
- 4 Instructional staff and Tutors are provided with appropriate level of health and safety training to enable them to fulfil their roles effectively.
- 5 Communicates the Health and Safety Policy and procedures, and any revisions thereof to his staff and to any other persons where it is in the interests of their health, safety or welfare and that this is disseminated to those that it may affect.

- 6 Implements the recommendations of any report issued by Fire and Rescue Authority, HSE, Insurance Company, Health and Safety Consultant or Competent person's recommendations in relation to investigations or audits carried out into health, safety and welfare matters within the Administration training function without due delay.
- 7 Examines, in conjunction with the Health and Safety Manager, any new equipment brought into the Administration Training Centre to ensure that it is CE marked, is compliant with relevant standards including the essential health and safety requirements and is safe to use when correctly used.
- 8 Notifies the Health and Safety Manager of any new substance (e.g. solvent, cleaning agent) identified as hazardous to health and that this is formally assessed prior to use.
- 9 Any developments in Health and Safety legislation, documentary guidance and codes of practice are effectively implemented within the Business Administrative training function within any specified time limits.
- 10 Notifies to the Health and Safety Manager and records any accidents, dangerous occurrences and ill health arising from the Company's work activities within their area of authority.
- 11 In conjunction with the Health and Safety Manager, investigates these incidents as required.
- 12 Reports to the Health and Safety Manager any concerns regarding health, safety or welfare in relation to her staff and any learners within the Business Administrative Training function without due to delay as this may impact upon the validity of any risk assessment.
- 13 Monitors the activities of any contractor working within the Business Administrative Training Centre as such activities may impact upon the health, safety or welfare of those working in this area and takes appropriate action on unacceptable health and safety performance.

Instructor/Tutor

The Instructor / Tutors ensure that they,

- 1 Provide learners with any information, instruction, training and supervision (including the application of disciplinary procedure) as is necessary to fulfil the requirements of the Health and Safety Policy and prescribed learning outcomes, maintain appropriate records and evaluate its effectiveness.
- 2 Undertake weekly Workshop Inspections and maintain appropriate and up to date records.
- 3 Maintain compliance with health and safety requirements by effective monitoring and management of day to day conditions (equipment, tools, materials, lighting, ventilation, heating, housekeeping) and practices within the section and within communal areas of the Training Centre (walkways, stores, canteen, toilet facilities, yards, fire exits and equipment, etc).
- 4 Resolve Health and Safety problems and report to the Chief Instructor (or in his absence the Engineering Manager) any unacceptable condition within their area of responsibility the resolution of which is outside their level of authority.

- 5 Respond to and report to the Appointed Safeguarding Officer any issues for which Safeguarding action is required (stress, bullying, discrimination, abuse, drug/alcohol problems etc) in relations to learner welfare.
- 6 Issue PPE in accordance with Risk Assessment requirements and ensure its use.
- 7 Cooperate and communicate with others (Management, visitors, contractors, etc) in relation to health, safety and welfare matters.
- 8 Report to the Chief Instructor any concerns regarding health, safety or welfare in relation to their learners within the Engineering Training function without due to delay as this may impact upon the validity of any risk assessment.

Tutors (Engineering and Administrative Apprenticeships & other courses)

Tutors ensure that they:

- 1 Maintain knowledge and understanding of health and safety matters pertaining to their area of activity including current legislative requirements and best practice.
- 2 Provide appropriate and correct guidance to their candidates and the learner's employer in relation to health and safety matters.
- 3 Respond to and report to the Appointed Safeguarding Officer any issues for which Safeguarding action is required (stress, bullying, discrimination, abuse, drug/alcohol problems etc) in relations to learner welfare.
- 4 Comply with the Health and Safety Policy and requirements of the client company whilst conducting their duties on the client site.
- 5 Conduct preliminary Health and Safety checks within client companies and inform findings to client and Engineering Manager.
- 6 Report to their Manager any unacceptable practices or conditions identified in the client company as this may impact upon the learners' health and safety.
- 7 Plan routes to client premises that minimise distance and risk.
- 8 Make daily vehicle checks (tyres, lights fluids etc) to ensure the roadworthiness of their vehicle.
- 9 Maintain the vehicle in a roadworthy condition.
- 10 Provide current driver insurance cover for business use.
- 11 Declare any driving offences for which convicted.
- 12 Drive only if fit to do so.
- 13 Comply with Road Traffic Act and related regulations (including use of mobile phones, smoking, etc.).

Health and Safety Manager:

1. Arranges adequate First Aid cover for the site to meet the requirements of the Company Health and Safety Policy.
2. Implements effective systems and records as required by statutory provision in relation to:
 - Lifting equipment examination
 - Pressure Systems examination
 - Gas installations
 - Electrical appliances testing
 - Electrical installations examination
 - Work equipment examination and maintenance
 - Fire warning and fire fighting equipment servicing
 - Fire equipment inspection
 - Fire warning system tests
 - Fire evacuation practice.
 - Statutory provision of information to employees
3. Examines, in conjunction with the Engineering Manager, any new equipment brought into the Company to ensure that it is CE marked, is compliant with relevant standards including the essential health and safety requirements and is safe to use when correctly used.
4. In conjunction with the Chief Executive, reviews the Company's health and safety performance annually and makes amendments to the Health and Safety Policy to accommodate change and to reduce loss events.
5. Arranges for adequate stocks of appropriate PPE and RPE to be maintained and issued as requested.
6. Arranges Employee training required by statutory provision or ACOPS that is provided through an external agency (such as First Aid, Slings, Abrasive Wheels etc.) where there is insufficient resource to provide this within the Company.
7. Ensures an effective Induction system exists for new employees and that this is effectively implemented.
8. Ensures training needs of all new and existing employees are established and that all employees are provided with adequate job information, instruction and training to ensure their health and safety. Any training provided is evaluated by conducting observation based competence assessment
9. Conducts and /or arranges for Risk assessments to be prepared for all work activities that present significant hazards and that these are reviewed annually or as new information arises through change in methodology, legislation, ACOPs, guidance or from the need to introduce new or additional procedures as the result of the analysis of any loss event.
10. Conducts and/or arranges for specific risk assessments to be prepared in relation to COSHH, Manual Handling, Work at Height, Display Screen equipment, Fire, Noise and any hazardous non-routine activities prior to the work being undertaken and that these are reviewed as necessary.
11. Arranges for any faults in electrical or mechanical systems and equipment to be rectified without due delay where these impact on health and safety.

12. Investigates RIDDOR reportable and any other significant accidents, dangerous occurrences and any ill health (including stress) issues and provides reports to the relevant authorities as required.
13. Conducts periodic Health and Safety Audits of the Company premises and activities and reports his findings and any non-compliances together with recommendations for improvement to the Chief Executive.
14. Conducts Health and Safety Audits of all client company learner placements and reports his findings and any non-compliances and makes recommendations on improvement/suitability to the Chief Executive.
15. Analyses health and safety performance annually by review of Accident book data and other relevant data and reports his findings to the Chief Executive as part of the Company annual review process.

All Employees and Learners

Employees and learners shall ensure that they:

1. Fully understand and adhere to their personal obligations and any specific rules under the Company Health and Safety Policy.
2. Act in a manner that preserves their personal health, safety and welfare and that of others who may be affected by their activities whilst at work within the Company premises or any client site.
3. Use any equipment, material or substance in accordance with the information, instruction and training given by the Company and, under no circumstances, recklessly or intentionally misuse anything provided in the interests of health, safety or welfare.
4. Refuse to undertake any work practice, procedure or operate any equipment for which adequate information, instruction or training has not been given and to make reasonable request to the Company management for this to be carried out.
5. Make proper use of any PPE, RPE or HPD provided for their use and report any defects that may arise immediately on recognition.
6. Report any work practice, procedure, item of equipment or material or substance that may give rise to unacceptable risk either to themselves or to others to the relevant Manager.
7. Report any accident, ill health, 'near miss' or dangerous occurrence, however minor, that could give rise to an accident to the relevant Manager without due delay.
8. Co-operate with colleagues and the Company Management to facilitate the effective implementation of the Health and Safety Policy and its requirements.
9. Declare any health condition that may affect their ability to perform their duties safely and without an adverse effect on their health.

Contractors:

Contractors shall ensure that they:

1. Fully understand and comply the company's standards for health, safety and welfare under the Rochdale Training Association Ltd. Health and Safety Policy.
2. Communicate any standards and rules within the Company Health and Safety Policy to any subcontractor.
3. Ensure competence of any subcontractor employed to work on any the Company site.
4. Liaise with the Company Management in relation to any work carried out and, in particular, any deviations from the planned activity where this may give rise to the need for additional risk assessment.
5. Possess a current Criminal Records Bureau status certificate and that this is presented prior to any contractual undertaking.

First Aider:

The First Aiders will ensure that:

1. Prompt attention is given to anyone requiring first aid treatment in accordance with the training received.
2. The First Aid Training Certificate is Valid.
3. The First aid kit contains the material prescribed in the Health and Safety (First Aid) Regulations 1981 Approved Code of Practice and related guidance (L74 2009).
4. Any First aid provided is recorded in the Accident book.
5. Any injury that is reportable under RIDDOR1995 is communicated to the Health and Safety Manager.

Fire Marshal

Fire Marshals shall ensure that,

- 1 They report any Fire equipment that is not maintained in a clean and accessible condition.
- 2 They maintain the necessary expertise to knock down small fires using fire fighting equipment.
- 3 They have read and fully understand the Company's Fire risk assessment.
- 4 In event of an emergency they direct the evacuation of people from the building to the Assembly point including providing assistance to those with mobility difficulties, maintaining calm behaviour within the group and conducting premises search.

Competent Assistance:

The Company shall appoint external competent assistance that shall provide assistance in matters pertaining to:

1. Health and Safety Audit of the Company to the agreed schedule.
2. Advice and assistance on health and safety matters including the implications of changes in legislation, ACOPS and guidance as these may affect company practices and assistance with any risk assessments as required.
3. The provision of any Air sampling assessment required.
4. The provision of any Noise or Vibration assessment required.
5. The provision of any formal health surveillance required.
6. The examination and maintenance of equipment, installations and services as required by statutory provision.
7. The provision of any specialist training required in relation to statutory provision or specifically in relation to employee health and safety matters for which specialist external training expertise is required.

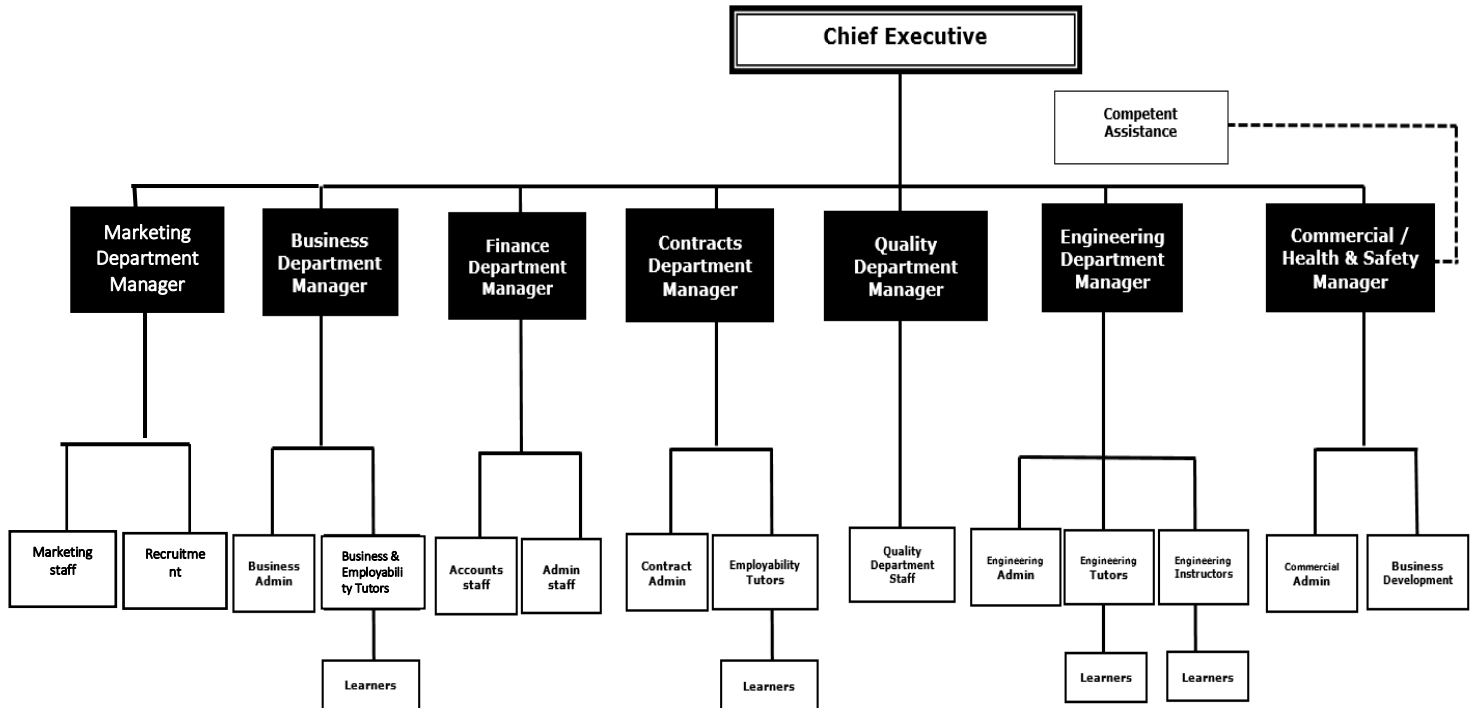
The Company shall take all reasonably practicable steps to ensure that any external assistance appointed is competent to undertake the work on the company's behalf.

Appointed Safeguarding Officers:

The Appointed Safeguarding Officers will

1. recognise learner welfare issues reported by staff that require safeguarding action
2. identify and initiate the intervention (e.g. referral to CPA, Social Services, Police etc) necessary to resolve any reported Safeguarding issue relating to the welfare of a learner
3. Investigate and report to the Chief Executive as required on matters pertaining to the Safeguarding of learners.

Rochdale Training Association Ltd Company Safety Organisation:



Section 3

HEALTH AND SAFETY POLICY and ARRANGEMENTS:

3.1 Consultation Policy:

- 3.1.1 The Chief Executive of the Company sees communication between all levels and roles within the organisation as an essential part of effective health and safety management. Consultation will be facilitated by means of daily face to face daily contact between the management and employees/learners.

3.2. Communication & Promotion of H&S Policy:

- 3.2.1 The Chief Executive of the Company will endeavour to communicate her commitment to safety and to ensure that employees, learners, contractors and others are familiar with the contents of the Company Health and Safety Policy. Any changes in the Policy or new information will be communicated to the employees and others orally, in the form of directions and statements, and in written form as necessary.

3.3 Co-operation & Care Policy:

- 3.3.1 If we are to build and maintain a healthy and safe working environment, co-operation between staff and learners at all levels is essential.
- 3.3.2 All employees and learners are expected to co-operate with management and to accept their duties under this policy. Disciplinary action may be taken against any employee or learner who violates safety rules or who fails to perform his or her duties under this policy.
- 3.3.3 Employees and learners have a duty to take all reasonable steps to preserve and protect the health and safety of themselves and all other people affected by the operations of the Company. This duty shall extend to reporting of any unsafe material, equipment or practice to the Management as soon as it is identified.

3.4. Safety Training Policy:

- 3.4.1 It is the opinion of the Management that health and safety training is an indispensable ingredient of an effective health and safety programme. It is essential that the training needs of every employee and learner in the organisation are assessed and that training to perform his or her job effectively and safely is provided.
- 3.4.2 All new recruits to the Company and learners shall be formally inducted by means of a written check list to a formal training programme that will include suitable reference to general health and safety matters (e.g. work practices, fire evacuation, first aid, safety rules) and this will be kept on file.
- 3.4.3 All staff that have direct learner contact will be formally trained to respond to learner declaration and to recognise learner behaviour requiring Safeguarding action.

- 3.4.4 Competent staff shall assess needs and shall train all employees and learners in safe working practices and procedures prior to being allocated any new role. Training given shall include sufficient reference to all safety aspects in relation to the task being trained including the use and maintenance of any necessary personal protective equipment/engineering controls and any emergency contingency plans (e.g. fire evacuation, bomb threat, major spillage,) relevant to the task concerned as defined by Risk Assessment.
- 3.4.5 All learners are given specific Safety training as part of their formal training within the Training Centre.
- 3.4.6 Competent external specialist training will be provided for employees as required by statutory provision, ACOP requirements or other guidance in relation such issues as First Aid, Abrasive Wheels.
- 3.4.7 The Management shall keep records of all learners' and employees' training on individual the personal files.
- 3.4.8 All training undertaken by employees will be evaluated for it effectiveness by post training questionnaire and through competence assessment by observation.

3.5 Risk Assessment Policy

- 3.5.1 Rochdale Training recognises its duties under The Management of Health and Safety Regulations 1999 that places an obligation on employers to look for and then control risks before incidents occur. They require all employers and self-employed people to assess the risks to staff or any others who may be affected by their work or business.
- 3.5.2 This is a 'predict and prevent' strategy rather than a 'react and rectify' strategy, which would be implemented following an incident.
- 3.5.3 Risk assessments are carried out to identify how the risks arise and how they impact on those affected. This information is required to make decisions on how to manage those risks so that the decisions are made in an informed, rational and structured manner and the action taken is appropriate.
- 3.5.4 When conducting a risk assessment, any existing control measures are taken into consideration. Arrangements are then assessed as to the suitability, effectiveness and compliance of the control measures and if risk is appropriately controlled to an acceptable agreed level.
- 3.5.5 Rochdale Training conforms to the regulations which require that an assessment should be 'suitable and sufficient'. In practice the risk assessment should:
 - 1. Identify the risks arising from or in connection with work, especially relating to significant risks
 - 2. Have a level of detail proportionate to the risks identified.
 - 3. Identify the length of time for which it remains valid.
 - 4. Call on examples of good practice from within the field of operation.
 - 5. Be practical and take into account the views of employees and safety representatives and managers.
- 3.5.6 Risk Assessments are reviewed and communicated annually; unless change or requirement to review has been highlighted sooner.

- 3.5.7 Rochdale Training also has a rigorous system in relation to learners placed in external companies. This ensures that appropriate policies, procedures and control of risks are in place for;
- Risk assessments
 - H&S policies
 - First Aid and Fire arrangements
 - Supervision
 - Machinery, processes and PPE
 - Safeguarding

3.6 LOCKDOWN POLICY AND PROCEDURE

- 3.6.1 This policy details the measures taken at Rochdale Training in the event of a lockdown to quickly restrict access and egress to the centre in response to a threat, either external or internal. The aim of lockdown is to prevent people moving into danger areas and preventing or frustrating the attackers accessing the centre (or part of).

A lockdown may be required in the following situations:

- An incident or civil disturbance in the local community which poses a risk
- An intruder on the site with the potential to pose a risk
- Local risk of air pollution, such as a smoke plume or gas cloud
- A major fire in the vicinity
- A dangerous animal roaming loose
- Any other external or internal incident which has the potential to pose a threat to the safety of staff and learners

- 3.6.2 Rochdale Training has devised lockdown procedures after consulting GOV.UK's Developing Dynamic Lockdown Procedures guidance.

The focus before, during and after lock down will be:

- The welfare and safety of learners and centre staff
- How to achieve an effective lockdown
- How to let people know what's happening
- Training staff engaged/involved in the conduct of examinations

3.6.3 Policy:

Rochdale Training recognises the potentially serious risks to learners, staff and visitors in emergency or harmful situations. A lockdown may take place where there is a perceived risk of threat to the training centre, its staff, learners, visitors or property. Where possible, Rochdale Training will act to ensure the safety of all personnel in the following situations:

- In the event that unauthorised person(s) considered dangerous, are on the training centre premises.
- In instances where personnel, students, volunteers or staff from within the centre become a threat to the well-being of others.
- In emergency situations within the environment of the centre where there is potential risk from spills or poisonous fumes.

A lockdown will be initiated by a member of staff using the telephone system/tannoy by pressing 'Lockdown' on the desk phone repeating "Lockdown Incident" to inform all staff that lockdown procedures are to be implemented a contacting a Lockdown Coordinator.

Speak loudly – do not shout.

- 3.6.4 All Lockdown Co-ordinators will enforce lockdown procedures. This will involve 'invacuation' to safe areas or remaining in the room/office, securing doors and windows, keeping out of sight, staying silent and not drawing any attention.
- 3.6.5 The person initiating lockdown should immediately contact any Manager or Lockdown Co-ordinator to inform them of the nature of the incident.
- 3.6.6 Lockdown Co-ordinators will update all staff verbally as to the status of the lockdown i.e.
- Amber Lockdown** is partial lockdown; the Lockdown Co-ordinators will dictate who can walk in areas outside of rooms/offices.
- Red Lockdown** is full lockdown, only the Lockdown Co-ordinators can be in the areas outside of rooms/offices.
- 3.6.7 Lockdown Co-ordinators will instruct people to take the additional measure of blocking doors.
- 3.6.8 Lock down procedures will be practiced from time to time to ensure that staff and learners are familiar with them.

Procedure and Practice

Lockdown Co-ordinator Area	Lockdown Co-ordinator	Deputy Lockdown Co-ordinator
Business Department	Cathy Partington	Leanne Glynn
Engineering Department	Rachel Yates	Matthew Guttridge
Engineering Workshop	Bill Sandilands	Nigel Bentley
Reception/Finance Department	Sarah Ogden	Chloe Smith
Marketing Department	Mark Whittaker	Nathan Finn
Ground Floor	Lee Shackleton & Jeremy Roberts	Lahreb Shafique

- All learners, staff and visitors to return to a Training Room.
- Close all windows and doors.
- Draw any blinds. Stay away from windows.
- Keep out of sight and minimise movement.
- Stay silent and avoid drawing any attention.

Endure:

Be aware that you may be in Lockdown for some time.

- 3.6.9 **The following steps provide guidelines for staff, learners and visitors in an emergency situation:**
1. Upon hearing the lock down signal a Lockdown Co-ordinator will call for assistance using '999'.
 2. The Finance Manager (or deputy) will lock the main Reception door and the Technical Centre entrance door will be locked by the Engineering Manager (or deputy) and the Workshop external door will be locked by the Chief Instructor (or deputy).
 3. The 'Lockdown Signal' will be initiated and lockdown procedures will take effect immediately.

3.6.10 **Staff, Learners and Visitors:**

Upon hearing the Lockdown signal, the following steps will be initiated:

1. Secure all windows and doors. If anyone is outside, call them in.
2. Collect register & mobile phone.
3. Do a head count immediately & call register.
4. Supervise, ensuring everyone remains out of sight and is sitting quietly.
5. No one should be allowed out of the room or safe area during a lockdown procedure.
6. Remain in lockdown until the all-clear has been given.

Lockdown Co-ordinators may escalate the situation following '**Stay Safe**' Principles (Run, Hide, Tell) – refer to Anti-Terrorism Incident Policy. This will escalate the situation to a Run Hide, Tell, procedure as opposed to Lockdown

In this instance the Procedure will escalate to a Pulse Alarm via the fire alarm system and Run, Hide, Tell, procedure will ensue.

3.6.11 **Procedure in the event of an External Examination + Lockdown occurs:**

The Exams Officer will, when possible, and if it does not pose any risk, immediately go to the Examination Room. Candidates will be told to stop writing immediately and to turn their papers over.

The attendance register will be collected and a note of the stop time made.

Candidates will be told to remain silent and await further instructions.

The Exams Officer will collect, and securely store, all examination materials, where appropriate.

3.6.12 **Once the Lockdown has ended:**

Where applicable and if advised to so do by the Chief Executive and/or Health & Safety Manager, if there is sufficient time remaining, candidates may restart their examination.

Invigilators will then:

- Ask candidates to return to their desks, remind them they are under exam conditions and allow a settling down period.
- Recalculate the revised finish time(s) to allow for the full exam time.
- Tell the candidates to turn their papers over and re-start their exam.
- Amend the revised finish time(s) on display to candidates.
- Note how long the lockdown lasted on the exam room incidents log (to later inform a report to the awarding bodies and where relevant, any centre-wide lockdown recording form/log).

3.6.13 **The Exams Officer will:**

- Provide a report of the incident for Awarding Bodies (via the special consideration process or as advised by Awarding Bodies).
- Safety/securely store all collected exam papers and materials pending Awarding Body advice/guidance.
- Where applicable/possible/available, the Exams Officer will negotiate any alternative exam sittings with the Awarding Bodies.

- 3.6.14 **Safety of the Invigilators, Exam Officer and any Learner should be put above the above procedures.**

Run, Hide, Tell, should still be implemented if there is a threat to life.

- 3.6.15 **If you are off-site during an attack:**

You will be informed and advised whether it is safe or not to return to the Training Centre. If not, you must find a safe place and remain to look after all learners in your care. Staff off-site without any learners in their care should wait for further information. Depending on the extent of the threat please be advised that you may not be able to return to site. You will need to consider your options in advance and have a plan for yourself. The Training Centre will not be able to advise you in this circumstance.

- 3.6.16 **LOCKDOWN WILL BE ENDED BY:**

1. A Lockdown Co-ordinator will announce "End of Lockdown" via the **desk phone ' Lockdown' tannoy.**
2. Lockdown Co-ordinators will enter each room/office to declare the "End of Lockdown".
3. A specific word or phrase may be used to confirm that the instruction that the **"End of Lockdown"** is genuine.

- **The current word is 'APPLE'.**
- **Therefore, the current phrase is "End of Lockdown – APPLE"**

This phrase will change regularly – and the word will change alphabetically. The new word will be communicated regularly at Team meetings.

4. Lockdown Co-ordinators will undertake a head count/register to confirm attendance

3.7 ANTI-TERRORISM/ Run, Hide, Tell INCIDENT POLICY

- 3.7.1 The threat from terrorism is serious, but it is important to keep it in perspective. The level of threat is complex and ranges from crudely planned attacks to sophisticated networks pursuing ambitious and coordinated plots. Rochdale Training's staff need to be aware to help prevent such an attack and be prepared in case of such an attack occurring whether conducted by learners, staff or members of the public.

3.7.2 Prevent Duty

Rochdale Training is committed to safeguarding and we recognise that it is our key role to support our learners and provide stability in the lives of those who may be at risk of radicalisation. We also recognise that our learners can be vulnerable and exploited by others. Staff will be alert to the signs of vulnerability and/or susceptibilities to any extremist indoctrination.

This policy is to enable staff to recognise and report suspicious activity, and to understand what action should be taken in the unlikely event of such an incident.

Staff may also contact the Anti-Terrorist Hotline on 0800 789 321.

3.7.3 Action to be Taken in the Event of a Terrorist Threat or Attack Suspicious Mail or Deliveries

Staff should be aware of any post that they receive in to the Training Centre. Deliveries could be explosive, incendiary, chemical, biological or radiological. If a suspicious parcel

is found or received it should be reported to the Chief Executive and Health & Safety Manager immediately. The Training Centre may be evacuated, however, in the immediate instance the room should be evacuated. The staff who reported the item should stay on site and make themselves available to the Police.

3.7.4 Suspicious Items

You are best placed to identify an item which is 'not right'. If you think an item is suspicious don't just dismiss it. In the event that a suspicious item is found in the Training Centre the person finding the item must immediately contact Chief Executive or Health & Safety Manager. If the item is found in a classroom the member of staff in charge should get the learners to leave the classroom immediately. The item must not be touched. Telephones in the surrounding area must immediately be placed in 'flight mode' and a distance of 20 metres should be cordoned off around the item.

If possible, the person finding the item should photograph it and try to note the following details:

What is it? <ul style="list-style-type: none"> ▪ Size? ▪ Components, ▪ Description? 	
Where is it? <ul style="list-style-type: none"> ▪ Exact location. ▪ Can you draw a map? ▪ Is it marked 	
When was it found? <ul style="list-style-type: none"> ▪ Has anyone moved or touched it? 	
Why do you think it's suspicious? <ul style="list-style-type: none"> ▪ Are there any potential targets? 	
Who are the witnesses? <ul style="list-style-type: none"> ▪ Keep them available 	

3.7.5 Marauding (Firearms or Weapons) Attack

A marauding attack is one or multiple people who are armed. In the unlikely event that a marauding attacker is spotted you must follow the steps listed below. Your first priority should be to yourself and any learners in your care.

All staff should follow the 'Stay Safe' principles of **Run, Hide, Tell.**

Run

- Escape if you can
- Think about the route that you are taking
- If it is not safe, HIDE
- Insist others come with you, but do not stay behind if they refuse.
- Leave all belongings behind.

Hide

- If you can't run hide
- Find cover (bullets can go through glass, brick, wood and metal, but not substantial brick work like in the Training Centre)
- Don't look for the attacker if you can see them, they can see you.
- Silence your phone and turn off vibrate
- Lock or barricade yourself in.
- Move away from the door.
- Be aware of your exits.

Tell

- All staff should be prepared to call 999.
- Location – where are the attackers?
- Direction – where did you last see the attackers?

- Description – Describe the attacker, numbers, features, weapons, clothing etc
- Further information – Casualties, type of injuries, building information, entrances, hostages
- If safe, stop other people entering the building.

It is likely that the Police will send an armed response make sure you:

- Follow the officers' instructions
- Remain calm
- Can you move to a safe area?
- Keep your hands in view
- Be aware that the police may aim their guns at you, treat you firmly, question you, be unable to distinguish you from the attacker.
- The police will evacuate you when it is safe to do so

3.7.7 Rochdale Training has undertaken a Vulnerability Assessment of the site. Please be aware of the following Red/Green areas.

Red Areas: posing highest risk of entry:

- Reception
- Engineering Workshop entrance
- Engineering Workshop fire exit

If you choose to Hide, please be aware of the **Green Areas** which offer the most protection and are difficult to find (areas being a room within a room).

Green Areas:

- EPA room in the Business Department
- Engineering Office (new)
- Corner Office in Marketing
- Functional Skills Resource Hub (Spotland Classroom)

3.7.8 **ACTIVATING THE RUN, HIDE, TELL PROCEDURE AND ALARM**

The Run, Hide, Tell Procedure will be initiated by anyone instructing the Reception Office to activate the Run, Hide, Tell alarm located in the Finance Office. This will activate a distinct Pulse Alarm, which is different to the continuous Fire Alarm.

You should either:

1. Press Lockdown on a desk phone and say "Run, Hide, Tell" loudly (not shouting) and repeat until the "Run, Hide, Tell" alarm is activated by Reception staff.

OR

2. Inform the Reception Office in person or by telephone (depending on the situation) and they will activate the "Run, Hide, Tell" alarm.

3.7.9 **If and when we can, Rochdale Training will contact you explaining** that the Training Centre is in Lockdown and the area which is affected. Any staff off site must stay off site. Staff off-site without any learners in their care should wait for further information. Staff with learners, must find a safe place and remain to look after all learners until informed that Lockdown has ended.

You will be informed and advised whether and when it is safe to return to the Training Centre. Depending on the extent of the threat you may not be able to return to site.

You will need to consider your options in advance and have a plan for yourself. Therefore, whilst we will endeavour to advise staff, you need to be prepared to act alone and make the necessary decisions for yourself and for your learners safety.

3.7.10 If you are involved in a terrorist attack while on a trip from the Training Centre

Before departing on any trip, a full list of all learners involved must be left with the Reception Office. Please make every effort to contact the Training Centre and explain what has happened, where, who is safe and who is unaccounted for. You must follow any instructions issued to you by the Police. The Business Continuity Plan will be put into action. Staff and learners on trips out should not return to the Training Centre during Lockdown.

3.7.11 After Effects

The priority after any incident will be to get the Training Centre back up and running, and the restoration of normal Training Centre life as soon as possible. However, Rochdale Training acknowledges that not all injuries will be physical and will work to make sure that all learners and staff are fully supported. All information given to the press and other outside bodies will be managed by the Marketing Department.

3.8 Workplace Inspections and Maintenance Policy:

3.8.1 It is the policy of the Company to comply with the Workplace (Health, Safety & Welfare) Regulations 1992.

3.8.2 The Health and Safety Manager, in conjunction with the respective Manager, assesses workplace hazards for risk and implements appropriate measures to provide effective control.

3.8.3 The Health and Safety Manager, in conjunction with the respective Manager, conducts and records regular premises inspections to ensure the effectiveness of Policy arrangements and the need for any additional measures.

3.8.4 The Company premises shall be maintained to provide for safe working. This will include maintenance of:

- Adequate standards of lighting
- Adequate temperature in the workplace
- The structure to prevent encroachment by rainwater, wind
- General floor conditions and access, stairways, etc.
- Yard areas.
- A System for the removal of waste
- General decorative conditions
- General cleanliness of the area.
- Welfare facilities – Toilets, Cloak rooms, rest area.

3.8.5 Formal audits of the work-place will be undertaken by the Health and Safety Manager at least annually to verify compliance with statutory provisions and the requirements of this Policy.

3.9 Work Equipment Policy:

- 3.9.1 It is the policy of the Company to comply with the law as set out in the Provision and Use of Work Equipment Regulations 1998, The Lifting Operations and Lifting Equipment Regulations 1998 and the Pressure Systems Regulations 2000, Gas Safety Installation and Use Regulations 1998, the Regulatory Reform (Fire Safety) Order 2005.
- 3.9.2 The Company Management will ensure that all equipment used in the workplace is safe and suitable for the purpose for which it is used. All equipment being brought into the Company for the first time will be thoroughly examined to ensure that it is safe to use before being issued for use regardless of whether or not it is CE marked. A Certificate of Examination will be provided with all hired equipment.
- 3.9.3 All learners and employees will be provided with adequate information and training to enable them to use work equipment safely and only those trained and authorised employees or learners will use the work equipment.
- 3.9.4 Hazards presented by the use of any work equipment (e.g. saws, lathes, milling machines grinding machines, lifting appliances, photo copiers, DSE equipment, shredders etc,) will be assessed for risk to the well being of employees and persons in or around the workplace, and suitable control measures will be implemented to minimise risk.
- 3.9.5 Lifting equipment, electrical Installations, pressure systems, gas appliances and systems and fire fighting equipment and associated Fire warning systems will be examined in accordance with regulatory requirements and Reports of Examination will be kept available for inspection.
- 3.9.6 All other work equipment will be maintained in good working order and repair and shall be subjected to annual examination where, through natural wear and tear, it could deteriorate in such a way as to present risk. Records of these examinations shall be maintained.
- 3.9.7 All learners and employees will be provided with such protection as is adequate to protect them from dangers occasioned by the use of work equipment in accordance with measures identified by risk assessment.
- 3.9.8 All work equipment will be clearly marked with health and safety warnings where appropriate.

3.10 Personal Protective Equipment (PPE) Policy:

- 3.10.1 It is the policy of the Company to comply with the law as set out in the Personal Protective Equipment at Work Regulations 1992 and the Personal Protection Equipment Regulations 2002.
- 3.10.2 Adequate stocks of personal protective equipment are held by the respective Manager and re-ordered by the Health and Safety Manager that will be provided to all learners and employees where the requirement has been defined by Risk assessment as a means of providing protection from risk to their health and safety while at work.

3.10.3 Any personal protective equipment provided by the Company shall be:

- Properly fitting,
- Appropriate to the hazard,
- Issued on a personal basis and be used when required
- Compliant with any relevant standards for the type of protection
- Maintained in good working order
- Recorded as having been issued to an individual employee/learner.

3.10.4 Any employee or learner provided with personal protective equipment will receive comprehensive training and information on the reason for the issue of the PPE, how to acquire replacements, its correct use, identification and reporting of defects and its maintenance.

3.10.5 The Managers will endeavour to ensure that all personal protective equipment provided to employees is used properly by them and that it is maintained.

3.10.6 The Instructors and Tutors will ensure that learners for whom they are responsible use the PPE provided correctly within their work activity.

3.11 Manual Handling Operations Policy:

3.11.1 It is the policy of the Company to comply with the law as set out in the Manual Handling Operations Regulations 1992 (as amended 2002).

3.11.2 Manual handling operations will be initially assessed for risk and those that present risk of injury will be avoided by mechanisation (lifters, trolleys) as far as is reasonably practicable.

3.11.3 Where it is not possible to avoid manual handling operations that present risk, a detailed assessment of the operation will be made taking into account the task, the load, the working environment and the capability of the individual concerned. Formal training in kinetic handling will be provided for any employee required to handle loads manually if competence cannot be verified.

3.11.4 All learners will be provided with instruction and training on manual handling as part of their formal training.

3.11.5 All possible steps will be taken to reduce the risk of injury to the lowest level possible.

3.12 Display Screen Equipment Policy:

3.12.1 It is the policy of the Company to comply with the law as set out in the Health and Safety (Display Screen Equipment) Regulations 1992 (as amended 2002)

3.12.2 The Company will conduct health and safety assessments of all workstations operated by any employee or learner who uses display screen equipment if such activity forms a significant part of their usual work. The Company will ensure that all workstations meet the requirements set out in the Schedule to the Regulations.

3.12.3 The risks to any user of display screen workstations will be managed and where possible they will be reduced to the lowest extent reasonably practicable as follows.

- a. Any employee or learner identified as a display screen equipment user will be allowed breaks from their workstation at their discretion and eye/eyesight tests will be arranged for display screen equipment users on verbal request to the Chief Executive. Where eye /eyesight tests have defined a requirement for visual correction in relation to the work that the display screen user performs basic special visual corrective equipment will be provided.
- b. Any employee or learner identified as a display screen equipment user will be provided with any additional equipment to facilitate their health and safety including a footrest, wrist support for key board and/or mouse, document holder etc.
- c. Any employee or learner identified as a display screen equipment screen user will be given appropriate and adequate training on the health and safety aspects of this type of work and will be given further training and information whenever the organisation of the workstation is substantially modified.

3.13 Control of Hazardous Substances Policy:

- 3.13.1 It is the policy of the Company to comply with the law as set out in the Control of Substances Hazardous to Health Regulations 2002.
- 3.13.2 Risk assessments will be conducted for all work involving exposure to any substance that presents hazards in use and these shall be based on manufacturers Health and Safety Data Sheets and Company knowledge of the work process. Health and Safety Data Sheets will be obtained for any new substance prior to use. No substance shall be used until the risk it poses to a learner or employee health and safety has been assessed.
- 3.13.3 Risk assessments will be made in relation to exposure of persons to hazardous substances that are generated by processes such as airborne dusts, mists, fumes and vapours in degreasing, machining or welding operations.
- 3.13.4 Exposure to hazardous substances is minimised and adequately controlled within specified limits (defined in EH40 Workplace Exposure Limits) by means of Extraction Ventilation where appropriate and, in all cases, PPE and RPE is used to control any residual risk.
- 3.13.5 Any Respiratory Protective Equipment issued to an individual learner or employee will be fit tested and the employee/learner provided with information and instruction on fitting and maintenance at the time of issue.
- 3.13.6 All learners and employees who come into contact with hazardous substances will be given access to a copy of the relevant Risk assessment and Health and Safety Data sheet and will receive comprehensive and adequate training and information on the health and safety issues relating to the use of the substance prior to its issue.
- 3.13.7 Assessments will be reviewed periodically, whenever there is a substantial modification to the work process, new information is published by the manufacturer or if there is any other reason to suspect that the assessment may no longer be valid. Any subsequent amendment to the risk assessment will be issued to those employees/learners that it affects.

- 3.13.8 Cutting fluids and coolants are regularly monitored by a contracted specialist who flushes systems and replaces the fluids.
- 3.13.9 Standing water systems are regularly monitored and treated as required by a contracted specialist.
- 3.13.10 Health surveillance will be established as required at an appropriate level in relation to any employee exposure to any hazardous substance within the workplace that may give rise identifiable symptoms of a specified occupational illness or disease for which there are known means of testing.

3.14 New or Expectant Mothers Policy:

- 3.14.1 It is the policy of the Company to comply with the MHSWR 1999 Reg 16 on Pregnant Workers.
- 3.14.2 In addition to the general risk assessment, a further assessment of risk (taking account of any physical, chemical or biological hazards) to new or expectant mothers will be conducted where appropriate. Where a risk to new or expectant mothers is identified, working conditions and / or working hours will be adjusted so as to avoid the risk. Where this is not reasonable the employee(s) concerned will be suspended from work on full pay. Where a satisfactory means of managing risk to a learner cannot be established the situation will be referred to the Funding provider /Employer.

3.15 Young Persons Policy:

- 3.15.1 The Company recognises that there are greater risks posed to young persons (those under the age of 18 years) than to adults and it is policy of the Company to comply with the Health and Safety (Young persons) Regulations 1997.
- 3.15.2 The general risk assessment will take account of such issues as,
- The risk posed to young persons by virtue of the Young person's inexperience and immaturity and lack of awareness of existing or potential risks
 - The availability of suitable PPE as protective measure
 - The physical strength, body dimensions, stature and ability of the young person to operate equipment safely e.g. finger access to danger zones identified where an adult would not normally be able to reach.
 - Work rates that may be determined by machinery
 - The way work is organised and high work rates
 - Hand arm vibration
 - Noise
 - The risk posed by biological hazards and /or chemical agents
 - The range, form and use made of work equipment
 - The degree of training and supervision
- 3.15.3 The Company shall ensure that, such additional risk assessments are in place *prior* to the young person being registered with the SFA
- 3.15.4 **Learners with learning and language difficulties/disabilities**
Rochdale Training is committed to ensuring all learners irrespective of learning disability or difficulty have equal opportunities to all training resources.

This is with the proviso that in attending the centre and specifically operating any machinery they are not putting their own health, safety and wellbeing in danger.

A full risk assessment pertaining to individual needs, circumstances and disability/difficulty are carried out.

Where personally practicable learners will have equal access to all training and facilities.

Rigorous support is offered to enable safe equality of opportunity e.g. we have English and maths specialist and an additional needs lead. Delivery staff undergo training in dyslexia and dyscalculia.

3.16 Fire Safety Policy:

- 3.16.1 It is the policy of the Company to comply with the Regulatory Reform (Fire Safety) Order 2005.
- 3.16.2 The Company's Fire Safety Policy and procedures take account of any special fire hazards in specific areas of the workplace.
- 3.16.3 The Company will conduct an assessment of Company practices and procedures that shall include inspection of fire fighting equipment, fire fighting procedure, fire warning, fire prevention, fire protection and means of escape. The Fire Risk Assessment shall be reviewed annually and further reviewed in the light of any changes in materials, practices, equipment or knowledge that may affect its validity.
- 3.16.4 A competent Fire Fighting Equipment company will be contracted to maintain Fire fighting equipment on an annual basis.
- 3.16.5 A competent Fire and Intruder Alarm company will be contracted to maintain the fire Warning system.
- 3.16.6 All learners and employees are informed during Induction of their duty to conduct their operations in such a way as to minimise the risk of fire, what to do in event of fire and how to notify fire.
- 3.16.7 The Fire exit door in Engineering (located nearest to the milling section and washbasins) is permitted (after due risk assessment) to be opened when high temperatures in the summer months make working uncomfortable. Other suitable exits are available in the event of fire. The door's metal gate is to be shut and bolted for safeguarding purposes and to facilitate ventilation.
- 3.16.8 **Fire Detection:**
If smoke is detected it is the responsibility of any learner or employee present to raise the alarm and evacuate the building. All learners and employees within the Company have a duty to report immediately any fire, smoke or potential fire hazards to the Fire Service (dial 999).

3.16.9 **Fire Fighting Equipment:**

Fire extinguishers are located around the premises. Employees are expected to tackle a fire:

- Only if they have received training in the use of fire extinguishers and fire fighting
- Only if it would pose no threat to their personal safety to do so. If the situation is potentially dangerous the employee should activate the alarm and evacuate the building immediately.

3.16.10 **Fire Exits:**

Fire exits are clearly marked and are located at strategic points throughout the workplace. Exit doors are never to be locked, blocked or used as storage space and are regularly inspected.

3.16.11 **Flammable materials:**

A minimum of number of Flammable substances is kept at the premises.

Flammable liquids are kept in a metal cupboard with spillage control arrangements and signage stating 'Flammable liquids' with only the minimum amount being available on the shop floor.

Oils are kept on spillage containment equipment to reduce fire spread.

3.17 Emergency Evacuation Policy:

3.17.1 The Company recognises its responsibility for the health and safety of all persons on its premises in the event of emergency such as a fire, telephoned bomb or similar threat, receipt of a suspicious parcel or letter, gas leak, flash flood or lightning strike and, to this end, has developed emergency procedures.

3.17.2 The Emergency Evacuation procedure is posted on Notice Boards. Visitors and contractors etc on the premises are informed of the procedure to follow by the person they are visiting or Responsible Person in charge of Contractors work.

3.17.3 In the event any emergency situation (such as a fire, gas leak, bomb threat, lightning strike or flood), all persons within the premises must leave the building by the nearest available exit and assemble at the Assembly Point in the Car Park clear of the building.

3.17.4 Procedures for dealing with specific emergencies are detailed in the Disaster Recovery Plan.

3.17.5 Practice emergency evacuation drills will be conducted at least annually to ensure employee and learner familiarity with emergency evacuation procedures.

3.18 Accident Investigation & Reporting Policy:

- 3.18.1 It is the policy of the Company to comply with the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR 95).
- 3.18.2 All accidents, incidents and health issues, whether or not they cause significant harm, will be reported to the Health and Safety Manager in order to facilitate an appropriate level of investigation.
- 3.18.3 The Company sees accident investigation as a valuable tool in the prevention of future incidents. In the event of an accident resulting in injury a report will be drawn up by the Health and Safety Manager detailing:
- The circumstances of the accident including photographs and diagrams wherever possible of the accident scene
 - The nature and severity of the injury sustained
 - The identity of any eyewitnesses
 - The time, date and location of the incident
 - What appeared to be the causes of the accident
 - The date of the report
 - Recommendations to prevent future occurrence
- 3.18.4 All eyewitness accounts will be collected as near to the time of the accident as is reasonably practicable. Any person required to give an official statement has the right to have a lawyer or trade union representative present at the company's expense.
- 3.18.5 The completed report will be presented to the Chief Executive and analysed to discover why the accident occurred and what action should be taken to avoid a recurrence of the problem.
- 3.18.6 All reports will be submitted to the company lawyers who will advise on liability, proceedings and quantum of damages. The lawyers will then submit the report to the company's insurance risk advisors for assessment.
- 3.18.7 The Health and Safety Manager is responsible for reporting certain accidents, dangerous occurrence, incidents, illness or disease that may be attributed to the employee's work to the Health and Safety Executive (Tel: 0345 300 9923, website: www.hse.gov.uk/RIDDOR) as required under the RIDDOR Regulations 95 and those involving learners to the Employer/Funding provider.

3.19 First Aid Measures Policy:

- 3.19.1 The Company takes steps to comply with the Health and Safety (First Aid) Regulations 1981.
- 3.19.2 The Health and Safety Manager will ensure that there are adequate First aid facilities available whenever persons are working on the premises. Inspection of First Aid kits and facilities will form part of regular workplace inspection and periodic audit.

3.19.3 First Aid facilities are located in the Office and Training Centre areas of the premises.

The persons holding a current First Aid certificate are Mark Hayes, Nigel Bentley and Leanne Glynn. Sarah Ogden is Rochdale Training's 'Mental Health' First Aid Officer.

3.19.4 All company vehicles will carry a First Aid Kit.

3.19.5 The First Aiders report on First Aid equipment provision to the Health and Safety Manager who oversees replenishment requirements for First Aid kits.

3.20 Noise at Work Policy:

3.20.1 The Company takes steps to comply with the Control of Noise at Work Regulations 2005 and to minimise the exposure of employees and others to noise as far as is reasonably practicable and, in any event, to within the daily exposure limits and daily exposure action values specified therein.

3.20.2 The Company will undertake an assessment of Noise levels to establish the Personal Daily noise dose of employees where it is estimated that those employees are exposed to noise above the Lower exposure action level identified in the Control of Noise at Work Regulations as 80dB(A).

3.20.3 The Company will take steps to reduce personal noise exposure of any employee to 80dB(A) or below by means other than the issue hearing protection devices (HPD) as far as is reasonably practicable.

3.20.4 The Company will ensure that any HPD provided is appropriate for the employee and for the noise level and, in any event, is verified to reduce noise level at the ear to 80dB(A) or below.

3.20.5 The Company shall review the assessment and introduce additional controls in the light of any apparent failure of any control measure that has resulted in an adverse effect on an employee's hearing.

3.21 Hand arm vibration syndrome (HAVS) Policy:

3.21.1 The Company takes steps to comply with the Control of Vibration at Work Regulations 2005 and minimise exposure of its employees to vibration as far as is reasonably practicable and, in any event, within the daily exposure limit values and daily exposure action values specified therein.

3.21.2 The Health and Safety Manager will make Risk assessments for any work activity such as angle grinding, hammer drilling where employees are exposed to potential risk from vibration including consideration of,

- Reference information about the vibration characteristics of the equipment.
- Measurement, if necessary, of the magnitude of the vibration to which the employees are exposed during the operation.
- The duration of the exposure.
- The effects of any vibration on the work equipment or workplace.
- The effects of the exposure.
- Specific work conditions such as damp or low temperatures.

- 3.21.3 The Management shall take steps to minimise risk from exposure to vibration by ensuring that,
- Tools and equipment are purchased with minimal vibration characteristics
 - Work activities are designed to provide breaks from activities that expose the employee to vibration
 - Equipment is adequately maintained
 - PPE is provided to minimise the effect of vibration and work conditions.
- 3.21.4 The Company shall undertake informal health surveillance as required for the purposes of identifying any failure in existing control measures that result in an employee experiencing symptoms of HAVS.

3.22 Lone Working Policy:

- 3.22.1 The Company takes steps to ensure that, under normal circumstances, employees are not required to work alone and at least two employees are on site at any time. However, the Company recognises that there may be occasions where circumstances make lone working unavoidable.
- 3.22.2 Learners are prohibited from working alone within the Company premises and any circumstance that is brought to the Company's attention in relation to a learner working alone within a Client company will be investigated by the Health and Safety Manager.
- 3.22.3 The Company will ensure that adequate security of the premises is maintained including control of access through entrances into the premises.
- 3.22.4 The Company will maintain mobile telephone contact with the employee at regular times to check on his/her status and, in the absence of such contact being made, the Health and Safety Manager or his representative will call in at the employee's location to establish contact.
- 3.22.5 The Company will ensure that any employee working alone has access to telephone facilities.

3.23 No-Smoking Policy:

- 3.23.1 It is the policy of the Company that smoking shall be prohibited throughout all areas within the premises, at all the entrances into the buildings and on any customer site other than a dedicated Smoking area.
- 3.23.2 The Company provides a dedicated Smoking area in the shelter between the 2 decking areas in the car park.
- 3.23.3 Smoking shall be prohibited while driving company vehicles.

3.24 Stress Policy

- 3.24.1 The Company recognises that, whilst work related stress is not regarded as an illness and that a certain amount of stress provides for high levels of performance, excessive levels of stress can be detrimental to an employee's or learner's health.

- 3.24.2 The Company will endeavour to identify any employee or learner who appears to be suffering from stress and will provide counselling for that person in an effort to establish the cause.
- 3.24.3 The Company will take all reasonably practicable steps to resolve any problem where the root cause lies within the learner's or employee's work role, work load, environment or work relationships. Irresolvable issues concerning learners will be referred to the Funding provider/Employer.

3.25 Violence Policy:

- 3.25.1 The Company, in recognising its responsibility for compliance with the Health and Safety at Work Act, and related Employment legislation (DDA, RRA, SDA, GRR, etc) accepts that it has a duty, so far as is reasonably practicable, to prevent any form of violence within its premises whether in the form of physical or psychological ill treatment.
- 3.25.2 The Chief Executive will investigate and take the appropriate disciplinary action in respect of any case of reported physical or psychological bullying, verbal abuse and obscenities or aggressive behaviour by a Company employee towards another employee or learner or any action specifically designed to humiliate a an employee within the Company premises.
- 3.25.3 The Chief Executive will investigate and report to the Employer/Funding provider in respect of any case of reported physical or psychological bullying, verbal abuse and obscenities or aggressive behaviour by a learner towards another learner or Company employee or any action specifically designed to humiliate those persons within either the Company or Client company premises.
- 3.25.4 The Company will take steps to provide for the security of any employee who is required to work alone as defined in Section 3.19 above.
- 3.25.5 The Company advises employees that, in the event of robbery, they should not offer any resistance to the aggressors.

3.26 Contractors Policy:

- 3.26.1 The Company recognises that contractors, whilst performing their work within contractual arrangements with the Company, are effectively employees of the Company. As such the Company has an obligation to manage their activities to ensure the health and safety of anyone that their work activities may affect.
- 3.26.2 The Health and Safety Manager will issue a pre-contract questionnaire to the proposed contractor and will verify the Contractor's qualifications and information provided.
- 3.26.3 The Health and Safety Manager will obtain references from previous contracts prior to agreeing contract.
- 3.26.4 The Health and Safety Manager will verify that health and safety procedures and arrangements have been established from suitable Risk assessments and Method Statements submitted by the proposed contractor prior to agreeing contract.

3.27 Transport Policy:

- 3.27.1 The Company has a duty to comply with the Road Traffic Act and the Health and Safety at Work Act in relation to the operation of its company vehicles on the public highway and on client premises.
- 3.27.2 The Company shall maintain records of all drivers of company vehicles and of those who drive on behalf of the Company and shall monitor driving licenses annually.
- 3.27.3 The Company will maintain its vehicles in a road worthy condition through regular servicing, repairs and MOT test as those requirements become necessary.
- 3.27.4 The Company will ensure that adequate insurance cover has been arranged for all drivers of Company vehicles and those who drive on behalf of the Company.
- 3.27.5 Road Fund tax shall be maintained on all Company vehicles.
- 3.27.6 The Company will ensure that only those authorised to drive Company vehicles do so and that those employees are competent to drive.
- 3.27.7 Drivers of Company vehicles will be advised of their responsibility for ensuring that the Company vehicle is checked before driving.
- 3.27.8 Drivers of Company vehicles or those that drive on behalf of the Company shall report any health condition that may have a bearing on their ability to drive a vehicle.
- 3.27.9 Those who drive vehicles on behalf of the Company will be advised of their responsibility for complying with any rules specified by clients or suppliers in relation to the operation of vehicles on their sites such as one way systems, speed limits, road markings, no parking areas etc.
- 3.27.10 Drivers of Company vehicles will report any incident involving the vehicle. The Management will investigate all such incidents and report as necessary to the Company's insurers.
- 3.27.11 Drivers of Company vehicles are responsible for the security of any load insofar as any movement may affect the safety of the driver.

3.28 Electrical Policy:

- 3.28.1 It is the Policy of the Company to comply with the requirements of the Electricity at Work Regulations and the IEE Wiring Regulations and HSE guidance in relation to electrical installations and equipment.
- 3.28.2 Only competent Contractors will be employed to undertake electrical installation work and PAT Testing of portable appliances. (See Section 3.23 above)
- 3.28.3 All plug-in electrical equipment including battery operated chargers, transformers, extension leads as well as appliances such as power tools, office and catering equipment (Kettles, Microwaves, etc.), office equipment including computers will be subject to periodic PA testing. All equipment will be recorded on a plant register and tests will be recorded. Any items not passing the test will be repaired or discarded.

- 3.28.4 Users of portable appliances will visually check them before use to ensure their safety including the condition of plugs, electrical leads, casings and operating controls and for current PA test certification. Users will report any defects, use an alternative item and hand the defective item in to the responsible Manager who will dispose of it.
- 3.28.5 Electrical Installations within the premises will be thoroughly examined every 3 years and suitable records will be kept. Any faults occurring meantime are reported to and immediately dealt with by the Chief Executive.
- 3.28.6 All 240 Volt plug in appliances will be powered through an appropriate RCD (30mA, 40milli/sec breaker).
- 3.28.7 Employees and learners are prohibited from bringing electrical appliances of any description onto the Company premises unless they declare the device and it carries a current PA test Certificate. Those who wish to do so are responsible for arranging testing of such equipment.
- 3.28.8 Sub contracted trainers etc using electrical appliances on the premises should ensure that such equipment carries a current PA Test Certificate.

3.29 Pollution Control Policy:

- 3.29.1 The Company recognises that it has a duty of care for the environment and will take all steps necessary to ensure compliance with the Environmental Protection Act, Pollution Control (Oil Storage) Regulations and the Hazardous Waste Regulations (2005) and related guidance.
- 3.29.2 The Company shall maintain registration with the Environment Agency in regard to the disposal of hazardous waste.
- 3.29.3 Waste Oils will be stored in a way that prevents spillage and leakage into drains and will be disposed of regularly through an approved hazardous waste contractor.
- 3.29.4 Empty hazardous substance containers will be collected, stored in a specific container and disposed of in accordance with Hazardous Waste Regulations requirements through an approved hazardous waste contractor.
- 3.29.5 All employees are aware of the above requirements, but management will monitor all work activity to ensure that no substances regarded as hazardous to the environment or are classified as hazardous waste are disposed of through sinks, toilets, drains or normal waste routes.

3.30 Work at Heights Policy:

- 3.30.1 It is the Policy of the Company to comply with the Work at Height Regulations 2005 in an effort to minimise risk on occasions when it is necessary to perform tasks above ground/floor level.
- 3.30.2 Any work at height will be assessed and will be avoided wherever possible by arranging the work to be done at ground level or, in the case of building maintenance, work from within the building.

- 3.30.3 Where work at height cannot be avoided the safest means of access will be used, namely the portable scaffold tower, in preference to ladder equipment.
- 3.30.4 Any access equipment (ladders, step ladders, tower scaffolds) will be to the appropriate standards (ladders EN131 minimum, towers BS1139) and suitable for its intended purpose including any accessory equipment such as Stand offs, ladders stops, levellers, ladders spurs and tie off equipment.
- 3.30.5 All access equipment will be annually inspected, and a record kept.
- 3.30.6 Those using any form of access equipment will be required to demonstrate competence in the erection and use of such equipment and will receive training as appropriate to their needs including the application of accessory equipment.
- 3.30.7 Any hired equipment will be required to be supplied with a Certificate of Examination.
- 3.30.8 Work at height shall be planned and supervised to ensure that the equipment is correctly erected and correctly used.

3.31 Asbestos Policy:

- 3.31.1 The Management of the Company are committed to an asbestos free environment and it is the policy of the Company to remove any ACM where reasonably practicable but to manage any ACM within the premises where this cannot be achieved in compliance with the Control of Asbestos Regulations 2006.
- 3.31.2 A Survey has been undertaken that identifies ACM within the premises and that provides information regarding its location and any action necessary to minimise risk from this material.
- 3.31.3 Where the ACM cannot immediately remove it shall be either encased or sealed to prevent the generation of airborne fibres. Any ACM that is treated as such will be clearly identified by the approved signage.
- 3.31.4 The condition of any ACM will be annually examined to ensure that it is not capable of releasing fibres and immediate action taken to either retreat or remove any ACM that has deteriorated.
- 3.31.5 Employees will be given suitable and sufficient information with regard to ACM retained on the premises.
- 3.31.6 Any Work activity involving an ACM will be suitably assessed for risk and employees provided with specific instruction in accordance with HSE Asbestos Essentials and the employee(s) concerned provided with appropriate PPE and RPE where this might give rise to the generation of airborne fibres.

3.32 Health and Safety Management System Review:

- 3.32.1 Whilst the Company is committed to compliance with Regulation 5 of the Management of Health and Safety at Work Regulations 1999 it recognises that effective management of health and safety performance is essential to the achievement of its mission to achieve an incident free environment and this

can only be achieved through regular formal annual review of the whole of its Health and Safety Management system.

3.32.2 The Chief Executive will, in conjunction with his Managers, at the end of each financial year review the Company's Health and Safety Management system to include,

- Planning for health and safety (resources, hazard analysis, risk assessment, methodology, standards)
- Organisation for health and safety (responsibilities, communication systems, training supervision, competence assessment) in its processes, systems and procedures,
- Monitoring mechanisms (workplace inspection, equipment examination, behaviour observation, incident investigation) for their effectiveness
- Control of its Health and Safety performance (defined responsibilities and standards of performance, effective systems, procedures and supervision, availability of adequate resources - standards, skills, time, equipment etc.),

with a view to identifying weaknesses in systems and procedures and any non compliance with health and safety standards and requirements.

The following sources of information and data may be considered:

- Health and Safety Management system Policy, Organisation and Arrangements
- Risk and Method statement data
- Work Instructions contained in the Company Health and Safety Manual
- Written feedback from clients and other contractors
- Accident Book records
- Accident investigation reports including those made under RIDDOR
- Expenditure on Statutory Sick Pay data
- Lost time incidents data
- Costs of loss events –time, repairs replacements data
- Civil claims made against the Company
- Enforcing Authority and Insurance Tutor reports
- Audit Reports including client company audits
- Equipment Examination reports required under Regulations
- Any new ACOPS, guidance and Legislation
- External competent assistance reports and guidance

3.32.3 The Review will identify areas for improvement in planning and organisation for health and safety in its processes, systems and procedures, the effectiveness of its monitoring mechanisms and its control processes.

3.32.3 The Chief Executive will ensure the revision of the Health and Safety Policy and any procedures, Risk Assessment, Method statement, documentation, recording system, etc. as necessary to resolve any issues that have arisen.