

HEALTH, SAFETY & ENVIRONMENT POLICY

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HEALTH AND SAFETY

A GENERAL POLICY STATEMENT

BY Managing Director

SHELDRAKE TRAINING LIMITED

1. Overall responsibility for Health & Safety within the Sheldrake rests with me as Managing Director. It is my intention to ensure that duties carried out within Sheldrake are done so safeguarding, so far as is reasonably practicable, the health, safety and welfare of all Sheldrake employees, contractors and visitors.

2. Sheldrake will:

- a. Comply with the Health and Safety at Work Act 1974.
- b. Provide working conditions that will ensure, so far as is reasonably practicable, a healthy and safe working environment for all.
- c. Provide a system for consultation with all Sheldrake personnel on health, safety and welfare matters through consultation with Sheldrake Health and Safety representative and if required Managing Director.
- 3. I will execute my Health and Safety responsibilities through the Health and Safety officer for the Sheldrake. These responsibilities will include the effective arrangements for identifying, controlling and monitoring potential hazards within Sheldrake. These arrangements will be revised as and when required and will be made available to all members of staff.
- 4. All personnel are required to take reasonable care for their own Health and Safety and of other persons that may be affected by their actions. All employed personnel within Sheldrake are required to follow and implement standing orders and instructions issued in respect of Health and Safety, in addition to those executed by the Managing Director.
- 5. Sheldrake has a duty of care towards learners engaged on its programmes. Sheldrake Health and Safety Officer will monitor the procedures of the learners' employer and workplace to ensure compliance with regulatory requirements. A periodic sample auditing of the learners' workplaces will take place in accordance with Skills Funding Agency (SFA) guidelines for the care of funded learners.
- 6. An initial audit will be carried out to check the policies and procedures prior to accepting a sub-contractor to represent Sheldrake. Any sub-contractors who enter the property on Sheldrake business must have read and comply with local policies and regulatory requirements. Annual audits of subcontractor policies and procedures will then be carried out.

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- 7. This policy statement is to be read in conjunction with the Work Based Learning Policy, and the Staff Handbook policy, found within the Sheldrake operations manual.
- 8. All policies are to be reviewed annually and signed by me, Managing Director Sheldrake.

CE Foxley Managing Director

This policy will be reviewed every 12 months by MD.

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INDIVIDUAL RESPONSIBILITIES FOR HEALTH AND SAFETY

2.0 Managing Director

The Managing Director has overall responsibility for all aspects of the Health, Safety and Environmental Policy.

In carrying out these duties the main responsibilities are to:

- 2.0.1 Encourage commitment to continual improvements in Health, Safety and Environment standards throughout the Company's organisational Structure.
- 2.0.2 Ensure the appointment of competent personnel to implement and monitor the working of the Health, Safety and Environment Policy within the Company.
- 2.0.3 Ensure that sufficient funds, facilities and manpower are made available to meet the requirements of the Company's policy.
- 2.0.4 Ensure that the Policy is reviewed at least annually and amended if there has been any significant change in organisational structure, legislation or arrangements for Health, Safety and Environmental Management. These reviews shall take into account the results of audit or any other monitoring activity.

2.1 Chief Operating Officer

Chief Operating Officer is are responsible for the implementation of the requirements of the Company's Health, Safety and Environmental Policy.

In carrying out these duties the main responsibilities are to:

- 2.1.1 Ensure staff familiarise themselves with the requirements of the Policy and ensure they are implemented.
- 2.1.2 Ensure managers are competent and give precise instructions regarding their responsibilities to ensure correct working methods are used.
- 2.1.3 Where necessary seek the advice of the H&S manager on any matter relating to safety.
- 2.1.4 When required accompany members of Health and Safety Audit teams when they are carrying out inspections where required and act upon advice given by them.
- 2.1.5 Seek to set a personal example at all times.

2.2 HEALTH. SAFETY AND ENVIRONMENTAL MANAGER

The H&S Manager must ensure that there are effective policies in place to enable the company to meet their legal responsibilities and protect the health, safety and welfare of persons affected by the business and the environment in which it works. In carrying out these duties his main responsibilities are to:

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- 2.2.1 Ensure that there are effective policies for achieving and maintaining good health, safety and environmental standards throughout the Company's activities and that these are approved by the Managing Director.
- 2.2.2 Continuously appraise the effectiveness of the policy and ensure that all necessary measures are carried out in order to maintain acceptable health, safety and environmental standards.
- 2.2.3 Report regularly to the COO on matters of health, safety and environment.
- 2.2.4 Ensure, where necessary, injuries and dangerous occurrences are reported to the employer and any other necessary agencies and be involved in subsequent accident investigation by them.
- 2.2.5 Undertake accident/incident investigations, when necessary, and assess accident reports to identify failings and to recommend any necessary changes to procedures.
- 2.2.6 When required, accompany members of the Health and Safety auditors when they are carrying out inspections where required and act upon advice given by them.
- 2.2.7 Keep up to date on the latest legislation, codes of practice, guidance notes and safe working practices relevant to the Company's work and ensure this is distributed throughout the Company.
- 2.2.8 Assist in the identification, implementation and assessment of health and safety training programmes for all employees. Where required undertake specialist training or arrange for this to be carried out.
- 2.2.9 Conduct, on a regular basis, audits of all sites to check the effectiveness of the company's procedures and to assess and advise on changes in work practise that maybe required.
- 2.2.10 Ensure that professional safety advice is available as required.
- 2.2.11 Ensure that all sub-contractors working in their area are trained and competent.
- 2.2.12 Ensure that provision is made for:
 - (i) Welfare facilities and their maintenance, to meet statutory requirements.
 - (ii) A qualified first aider or appointed person on all sites and there are appropriate first aid equipment/facilities.
 - (iii) Suitable protective clothing and equipment is available and used.
 - (iv) Only suitably trained and competent personnel are employed and that their certification is up to date.
- 2.2.13 Ensure that new employees are given a safety induction and are shown the correct method of working and all safety precautions.

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2.2.14 Set a personal example at all times.

Additional responsibilities are to:

- 2.2.15 Be responsible for ensuring that electrical testing of IT equipment is carried out on a regular basis.
- 2.2.16 Ensure that all workstations are ergonomically sufficient for users of IT equipment.
- 2.2.17 Ensure all information, documentation, systems and software relating to health, safety, welfare and environmental matters stored on the company server are backed up and available upon request.
- 2.2.18 Ensure all users of IT equipment have access to all relevant information, documentation, systems and software relating to health, safety, welfare and environmental matters stored on the company server
- 2.2.19 Ensure that equipment has a current test certificate, is only operated by authorised, competent persons and is inspected on a regular basis and that any defects are reported and rectified.

2.3 FINANCE

The main responsibilities are to:

- 2.3.1 Ensure that the Company has in place, as a minimum, insurances to meet statutory requirements.
- 2.3.2 Periodically review claim and loss trends and make suggestions to improve risk management.
- 2.3.3 Assist in the evaluation of corporate risks arising from the Company's activities in conjunction with Health, Safety and Environmental personnel and Insurance/Liability surveyors.

2.4 PROGRAMME MANAGERS

Programme managers are responsible for the implementation of the requirements of the Company's Health, Safety and Environmental Policy in their area of responsibility.

In carrying out these duties their main responsibilities are to:

- 2.4.1 Familiarise themselves with the requirements of the Policy and ensure they are implemented.
- 2.4.2 Where appropriate, ensure that risk assessments are produced and issued to those affected.

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- 2.4.3 Ensure the implementation of:
 - (i) Safe methods of working.
 - (ii) Systems to identify hazards and unsafe situations
- 2.4.4 Where appropriate, seek advice from the H&S manager on these matters.
- 2.4.5 When required, accompany members of the Health and Safety Audit team when they are carrying out inspections where required and act upon advice given by them.
- 2.4.6 Report all injuries and dangerous occurrences to the H&S manager.
- 2.4.7 Where necessary discuss with and seek the advice of the H&S manager on any matter relating to Health, Safety or the Environment.
- 2.4.8 Regularly carry out H&S inspections on areas under their control.
- 2.4.9 Set a personal example at all times.

2.5 EMPLOYEES

As an individual undertaking an operative task you are responsible for ensuring that you look after your own health and safety and do not cause problems to others.

In particular, it is the personal responsibility of each employee to use properly and conscientiously all safety equipment, devices, protective clothing and equipment that is fitted or made available.

All employees must:

- 2.5.1 Carry out their work in accordance the safe working practices adopted by the Company.
- 2.5.2 Always obey all Company and specific site safety rules.
- 2.5.3 Wear any personal protective equipment issued to them and ensure the equipment is kept in good condition.
- 2.5.4 Work in a safe manner at all times. Do not take unnecessary risks that might endanger yourself and others.
- 2.5.5 Not use equipment for work for which it was not intended or if you are not trained or experienced in the use of it.
- 2.5.6 Keep work areas clean and tidy.
- 2.5.7 Ensure all waste materials and rubbish are routinely removed and placed in the correct bins or skips

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- 2.5.8 Report any excretions of bodily fluids to the H&S Manager who will inform the relevant cleaning agencies.
- 2.5.9 Ensure that equipment is left in a safe and secure state at all times when not in use.
- 2.5.10 Report personal injuries and near misses to the H&S Manager and ensure that entries are made in the Accident Book. You may be required to assist in any subsequent investigation.
- 2.5.11 Report any dangerous occurrences or near misses to the H&S Manager.
- 2.5.12 Not play dangerous or practical jokes or "horseplay" whilst on Sheldrake business.
- 2.5.13 Not work under the influence of alcohol or drugs.

3. Arrangements for Managing Health, Safety and Environment

3.1 ACCIDENT REPORTING

General

3.1.1 It is our policy to protect the interests of our employees who, while acting responsibly in the course of their employment, are involved in incidents resulting in injury to themselves or others or damage to property.

In Practice

- 3.1.2 If, during the course of your employment, you are involved in any incident, which results in an injury to anyone, however slight, or causes any damage to property, you must report the facts and circumstances of the incident to the H&S manager at Sheldrake. You must also ensure that should an incident occur while outside of Sheldrake you follow the reporting procedures adopted at that venue.
- 3.1.3 The facts and circumstances of the incident, including details of any witnesses, should be reported without delay to your manager.
- 3.1.4 Your early report of the incident will enable us to consider both our own position and whether or not any assistance can be given to you in pursuing or protecting yourself against any claim or legal action that may result from the incident.
- 3.1.5 Your duty to report any incidents to us is in addition to any other legal obligation you may have as a result of an incident.

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3.1.6 Accidents at work should be reported to the Health & Safety Manager and or First Aider and recorded in the Accident Book.

3.2 CONTROL OF SUBSTANCES HAZARDOUS TO HEALTH (COSHH)

It is not expected that Sheldrake employees will be handling or using large quantities of chemicals or substances, however, should any be used then Sheldrake will ensure that an up-to-date material safety data sheet (MSDS) is available and a COSHH assessment is carried out prior to the use of the chemical or substance. This assessment will be communicated to employees and others who maybe affected and where possible substitution for less hazardous substances will be made. If this is not possible then suitable control measures will be introduced and monitored.

3.3 CONTROL OF WASTE

All waste will be placed into the appropriate waste containers by the Health & Safety Manager.

3.4 DRIVING AT WORK

Sheldrake recognises the importance of ensuring that employees who drive in the course of their work are as safe as reasonably practicable. In carrying out this duty Sheldrake will ensure that:

- a. Drivers are fit and competent and, where necessary, training will be given.
- b. Vehicles are suitable for the purpose for which they are used.
- c. Vehicles are maintained in a safe and fit condition.
- d. All safety equipment is properly fitted and maintained.
- e. Schedules are, taking account of all circumstances, realistic and drivers allowed sufficient time to complete their journeys.

3.5 EMERGENCY RESPONSE

Emergency response plans and procedures are established and well understood. The personnel with emergency response roles and responsibilities are competent to carry out their duties. Appropriate emergency response facilities and equipment are provided. Emergency response drills and exercises are undertaken regularly.

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3.6 EYE EXAMINATIONS

All staff who use display screen equipment as part of their daily work routine, may claim the cost of an eye examination test once per year. The full DSE Policy can be found in the staff handbook.

3.7 FIRE PRECAUTIONS

In accordance with the Fire Regulations assessments will be carried out periodically to identify the fire hazards and the people at risk. Control measures will be implemented to reduce the risk as much as possible, or remove it altogether and the findings and measures will be recorded. Fire extinguishers and other means of fighting fire will be provided at all times. All fire fighting equipment will be easily accessible and be indicated by pictorial signs. All fire fighting and alarm equipment must be inspected by an appointed person on a regular basis. All escape routes will be clearly signposted and kept free from obstructions at all times. All equipment and facilities provided to protect employees and others from the dangers of fire, such as fire extinguishers, fire fighting equipment, alarm systems and emergency doors, will be regularly maintained and any faults found will be rectified as soon as possible. A record will be kept of such inspections.

3.8 FIRST AID

A suitable and sufficient number of trained personnel will be appointed to render first aid when necessary. The training will be carried out by an organisation registered with the Health and Safety Executive and refresher training will be provided every three years. Other employees will, in the absence of the trained first aider, be capable of taking charge in an emergency, calling an ambulance and looking after first aid equipment. A suitable number of first aid boxes will be provided and maintained. Display notices will give the identity and location of first aiders.

3.9 HEALTH, SAFETY AND ENVIRONMENTAL TRAINING

All employees will attend an induction training session on the first day of employment. A regular review of training needs, to ensure that personnel are competent to carry out their duties, will take place and any initial/refresher training requirements that are identified will be carried out.

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3.10 INFORMATION & DOCUMENTATION

Effective information and documentation management systems are in place such that:

- a. Drawings and other pertinent documentation necessary for health, safety and environmental compliant operations are identified, current and accessible.
- b. All applicable regulations, codes and standards are identified, current and accessible
- c. Document retention and archiving requirements are satisfied
- d. The currency of systems and procedures is ensured
- e. Roles and responsibilities in relation to information and documentation management are clearly understood
- f. Appropriate use is made of electronic information management system.

3.11 MANUAL HANDLING

Sheldrake will comply with the Manual Handling Regulations and the latest Health and Safety Executive publications showing good practice. Assessments will be made of the items that are to be lifted manually and wherever reasonably practical mechanical aids will be provided to reduce the need to manually handle materials to a minimum. Training will be given in order to reduce the likelihood of back injuries or other work related upper limb disorder.

3.12 OCCUPATIONAL HEALTH

Employees are able to raise occupational health issues and the communication of known hazards made to all those that could be affected. Appropriate corrective/preventative measures are implemented and the follow-up action is taken to ensure improvements are implemented. Workplace inspections and job observations take place as necessary to assist in identifying regulatory medical requirements. Appropriate risk assessments are carried out where necessary.

3.13 OFFICE WORKING

Office equipment will be maintained in good condition and positioned to allow adequate clearance for staff. Sharp objects such as broken glass, razors etc. must not be deposited

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in waste bins - remember someone has to empty these containers. Paper should always be placed in the bin for recycling. The instructions which accompany printing and photocopying machines, particularly the requirement to switch off the machine before clearing paper paths, cleaning parts, or making adjustments must be followed. Never attempt to repair machines unless trained and authorised to do so. A stepping stool or step ladder must be used to reach high objects.

3.14 PERSONAL PROTECTIVE EQUIPMENT

Sheldrake employees will be provided with the appropriate PPE which has been identified as necessary through current legislation and risk assessment. During work on sites all Sheldrake employees (and their sub-contractors) shall comply with any specific requirements for the use of PPE made by the location manager.

3.15 RISK ASSESSMENTS

Health, safety and environmental risks are identified and their consequences and probabilities properly assessed. Appropriate risk reduction or mitigation measures are identified and implemented. Risk assessments will also be produced, as necessary, to meet the requirements of the specific legislation. Risk assessments are undertaken by competent personnel including where necessary, expertise external to the operating unit. Risk assessments are subject to an appropriate review and validation process and are properly documented. Affected personnel are made aware of, and understand risk assessment(s) relating to their activity/activities.

3.16 WELFARE

Sheldrake will ensure that adequate welfare arrangements, in accordance with the requirements of the Regulations, are provided for all employees. Toilets, washing facilities, and the kitchen area will be kept clean and tidy at all times and a supply of drinking water will be provided and conspicuously marked by an appropriate sign. Any employee found damaging or vandalising welfare facilities will be subject to disciplinary proceedings.

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