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HEALTH, SAFETY & ENVIRONMENT POLICY

Part 1. General Statement of Intent

A strong Health and Safety culture and a safe and secure environment are fundamental to the success of Activate Learning, and all staff, learners and visitors share responsibility for the promotion and improvement of H&S across the Group.

We are committed to ensuring, as far as is reasonably practicable, the H&S of all our stakeholders, and creating a positive, proactive and legally compliant culture. We will establish strong systems, communicate clearly and provide resources to help all employees understand their responsibilities.

We aim to maintain the highest standards of H&S and to continuously improve by encouraging strong leadership and a common-sense approach to H&S in our colleges. We aim to prevent exposure to risks, injuries and work-related ill health to all who may be affected by our work, by:

- Defining responsibilities,
- Maintaining safe and healthy workplaces and systems of work,
- Conducting risk assessments to ensure safe procedures and systems of work,
- Providing and maintaining safe equipment that is suitable for its intended use,
- Setting appropriate priorities,
- Providing competent H&S advice to staff,
- Provide suitable and sufficient information as may be reasonably required by law to staff, learners and other persons relevant to their health, safety and wellbeing.
- Monitoring accidents and incidents and making recommendations for corrective action,
- Encouraging a sensible and proportionate approach to H&S.

This policy will be reviewed annually or sooner as required.

Signed:

Signed:

S Sturgeon
Chair of Corporation
Date: Jun 2021

Sally Dicketts CBE
Chief Executive Officer

Purpose

This policy and its associated procedures form a framework which protects our stakeholders from occupational injury and ill health. This framework is built on the following key principles:

- Aspiring to 'Best Practice' in health, safety and wellbeing performance,
- Complying with relevant legislation and implementing suitable health and safety management systems; and
- Recognising that health, safety and a safe and secure environment is essential for good management, and should be prioritised at all levels within the organisation and supported through training and development.

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Part 2. Organisational Responsibilities

2.0. We all share a duty to ensure the health and safety of themselves and others and we will work collaboratively to ensure that Activate Learning meets its responsibilities under health and safety legislation. Our responsibilities are summarised below and outlined in more detail in individual job descriptions.

2.1. The Corporation Board

The Corporation Board is responsible for ensuring their decisions reflect best practice in HS&W, setting the overarching principles of HS&W practice for Activate Learning, and ensuring that they have effective methods of monitoring compliance and addressing risk. The Board will appoint a Health & Safety Link Governor, who provides a support and oversight to the Group around HS&W in line with the Role Description, and reports to the Corporation Board on an annual basis.

2.2. Chief Executive Officer (CEO)

The CEO is responsible to the Corporation for the implementation of this policy and embedding a strong HS&W culture. The CEO may delegate relevant duties but not ultimate responsibility for HS&W and compliance with relevant legislation. The CEO is responsible for ensuring appropriate mechanisms of performance monitoring and management throughout the Group. The CEO's responsibilities as Duty Holder and Responsible Person are detailed within the appropriate procedures.

2.3. Chief Financial Officer (CFO)

The CFO is responsible for ensuring adequate resources are provided to support a strong HS&W culture and an acceptable level of HS&W management. The CFO acts as Chair of the H&S Board.

2.4. Group Executive Team (GET)

The GET is responsible for demonstrating commitment to this policy and the HS&W of all stakeholders, through both personal conduct and strategic decision making.

2.5. Director of Governance

The Director of Governance is responsible for ensuring that the Corporation Board is adequately equipped to fulfil their duties in respect of HS&W.

2.6. Director for People and Change (DP&C)

The DP&C is responsible for ensuring that HS&W priorities, responsibilities and competencies are reflected in all aspects of Human Resources policy, procedures and practice. This includes job descriptions, recruitment practices, reasonable adjustments, sickness management, training, performance management and staff wellbeing.

2.7. Director of Group Facilities Operations (DGFO)

The DGFO is the focal point for all Group level facilities operations and for monitoring the activities of the P&E Managers and their teams. In addition to this s/he is delegated by the CEO as the Duty Holder (Asbestos) and Responsible Person (Legionella Operations).

The DGFO is responsible for the safe management and maintenance of all premises operated by the Group, including ensuring management of contractors, maintenance of equipment and appropriate P&E staffing on premises.

2.8. Group Head of Health, Safety & Environment (HoHS&E).

The HoHS&E is Activate Learning's competent person for occupational health & safety and workplace environment matters and is responsible for monitoring developments in legislation and best practice and providing advice and guidance accordingly. The HoHS&E is responsible for raising any concerns of non-compliance and immediately stopping any potentially unsafe activities until appropriate safe measures are implemented.

2.9. Health, Safety & Environment Business Partners (HS&E BPs)

HS&EBPs are responsible for providing regular HS&E updates, raising any concerns of non-compliance, and immediately stopping any potentially unsafe activities until appropriate safe measures are implemented. HS&EBPs are responsible for providing advice, guidance and support to relevant managers and the regional HS&W Committee, and monitoring HS&E compliance, first aid provision, fire safety and emergency evacuation procedures, accident reporting, risk assessments and HS&E Action Plans. HS&EBPs are responsible for liaising with local managers and external bodies, such as the HSE and TU H&S representatives.

2.10. Group Leadership Team (GLT)

Directors are responsible for implementing this policy within their areas of responsibility, including projects, and promoting a strong HS&W culture, including through role modelling and empowering staff to stop any activity they believe is unsafe. Directors are responsible for ensuring that their teams and any contractors are aware of their responsibilities under this policy and are fully equipped to complete their duties safely. Directors are responsible for ensuring equipment is safely maintained, risk assessments are completed and implemented, and appropriate HS&W records are kept within their areas.

2.11. Managers

Managers are responsible for monitoring and ensuring the safe working practices of staff and learners in their areas and ensuring robust risk management through identification, assessment and communication of risks and safety measures. Managers are responsible for ensuring appropriate training, supervision and consultation on HS&W matters, and that safe systems of work are implemented, including the use of PPE and empowering staff to stop any activity they believe is unsafe. Managers are expected to support accident and near miss investigation as required.

2.12. Heads of Campus and Student Experience (HoCSE)

HoCSE are the primary focal point on Campuses for emergencies. They will cover as the Fire Officer and Incident Commander prior to the arrival of the Emergency Services.

They will be supported in their role by the P&E Manager and Duty Director as well as by Fire Wardens, First Aiders, and any delegated staff.

2.13. Staff

All staff must take responsibility for the health and safety of themselves and those around them; this includes ensuring that they understand and adhere to this policy and relevant HS&W procedures and risk assessments. Staff are responsible for promptly reporting any issues, accidents or near misses and immediately stopping any activity they consider to be unsafe. Staff are responsible for only undertaking tasks in line with their competency and seeking training and support where needed.

2.14. Learners

All learners must take responsibility for the health and safety of themselves and those around them; this includes following instructions given by members of staff and the Learner Contract.

2.15. Campus Coordinators

Campus Coordinators are responsible for undertaking any Health and Safety duties, as contained within the Campus Coordinators Code of Practice, during or resulting from their period on duty.

2.16. Trade Union (TU) Health and Safety Representatives

TU Health and Safety Representatives are responsible for working collaboratively with Activate Learning to promote a strong HS&W culture, liaising with relevant staff and conducting inspections and investigate complaints, hazards and incidents as appropriate.

2.17. Health, Safety & Wellbeing (HS&W) Committee

The HS&W Committee consists of the Executive Director, Senior Managers (Faculty & Support Services), HHS&W, Health & Safety Business Partner, TU Health and Safety representatives, Student Union Health and Safety representatives and the PA to the Executive Director. Further details of roles and responsibilities may be found in COP No24 Performance Measurement and Review Procedure.

2.18. Health & Safety Board

The Health & Safety Board consists of the CEO (Chair), regional Executive Directors, CFO, HoHS&W, H&S Champion, DP&F and DP&C. Further details of roles and responsibilities may be found in COP No24 Performance Measurement and Review Procedure.

2.19. Property & Environment Managers

Property & Environment Managers are responsible for ensuring a safe, stimulating, and business-like environment for learners at the campus, advising on HS&W compliance in facilities operations and maintaining registers for the maintenance and servicing of relevant equipment and infrastructure. The P&E Manager is the Deputy Duty Holder (Asbestos) (DDH(A)) and the Deputy Responsible Person (DRP) to maintain Legionella compliance.

2.20. Faculty Technicians

Technicians are responsible for providing a point of contact for HS&W matters within their curriculum area and liaising with the HS&W BP's and managers to ensure safe working practices. Technicians are

responsible for monitoring day to day activity and assisting with inspections, investigations, and communication with staff.

2.21. Radiation Protection Supervisors (RPSs)

RPSs are responsible for coordinating and advising on radiation safety within their curriculum area, developing and implementing procedures that comply with relevant legislation and providing advice, training, inspections, record-keeping and reporting.

2.22. HR Business Partners (HRBPs)

HRBPs are responsible for providing or signposting to guidance on eye tests, Occupational Health referrals, work related stress and sickness management. HRBP's are also the initial contact for Wellbeing matters.

Part 3. General Arrangements

3.0. This primary HS&W Policy is supported by secondary documentation in the form of Codes of Practice (CoP) which detail the following arrangements as procedures and processes. Tertiary documentation in the form of Safety Guides provide more detailed guidance to support the CoP's. This documentation is available on the [College HS&E portal](#).

3.1. Abrasive Wheels

Only competent employees should operate abrasive wheels. Employees should hold the appropriate qualification for dressing or replacing abrasive wheels.

For further information and guidance please refer to **CoP Work Equipment Use**.

3.2 Accident Reporting, Investigation and Monitoring.

An accident is defined as any unplanned event that results in causing injury or ill health to people, damage to property or the environment. A 'Near Miss' is defined as an incident that has the potential to cause harm or damage even though no harm or damage is caused. For further details please refer to **CoP First Aid Provision, Accident and Incident Reporting and Investigation**.

3.3. Advice, Consultancy and Guidance

Where external health and safety consultancy or specialist advice is required, this should be done in conjunction with the HoHS&E and HR where applicable. The HS&E Team will advise on the maintenance and storage of HS&E documentation.

3.4. Animals in the Workplace.

Animals are permitted in the college workplace under the following classifications:

- **Working / Teaching Animals.** These are animals that are used as a 'teaching aid' for animal related subjects.
- **Emotional Support Animal** (also known as comfort animals or therapy animals)
- **Assistance animals**

Other animals (pets) may be permitted in the workplace at the discretion of the relevant regional Executive Director and Faculty Director. For further information and guidance please refer to the **CoP Pet Animals in the Workplace**

3.5. Asbestos

Most Asbestos Containing Materials (ACM) within our buildings have been removed over the years. Any remaining is identified in an asbestos register, is maintained in good condition, and managed to prevent the release of fibres, thereby ensuring it does not present a risk to health. It is also important that any damage to building structures – walls, floors or ceilings – is reported promptly to the Helpdesk.

The Corporation, as the employer, has ultimate responsibility for health and safety. The Director for Group Facilities Operations is the Duty Holder under the Control of Asbestos Regulations 2012. The duty to manage asbestos is contained in regulation 4 of the Control of Asbestos Regulations 2012.¹ For further information and guidance please refer to the **CoP Group Asbestos Management Plan**

3.6. Campus Coordinator / Duty Director.

A member of management will be on duty during the day and evenings while the College is open. For

¹ ACOP L143 'Managing and working with asbestos'

further information and guidance please refer to **COP Duty Manager Procedures**.

3.7. Classroom or Facility Use by Unsupervised Learners

Unsupervised use of classrooms or facilities by learners may result in accidents, injuries or damage to equipment. Tutors have a Duty of Care responsibility towards their learners. Learners are not permitted unsupervised in any classroom, lecture room or the following areas/classrooms under any circumstances:

- Construction related, Engineering or Motor Vehicle workshops
- Science laboratories, prep rooms, classrooms, or storerooms
- Performing Arts Studios and Creative Art rooms
- IT & Media classrooms and Recording Studios
- Training restaurants or kitchens
- Hair & Beauty Salons
- Conference rooms

Only in exceptional circumstances will learners be permitted to use low risk areas/classrooms for private study. Prior approval of the Faculty Manager is required and if private study is approved then it is to be arranged and monitored by the student's relevant tutor:

3.8. College Events

All college events are to be assessed for any hazards and level of risk. For further information and guidance please refer to **COP Event Planning**.

3.9. Display Screen Equipment (DSE)

Employees who are required to use display screen equipment will be required to complete the online DSE training on ALO. After completing the training, they will be required to complete the Workstation Self-Assessment form, which is provided automatically at the end of their DSE training. Any remedial action from the Self-assessment is to be actioned initially by the employees manager and will be followed-up by the appropriate department i.e. HS&E, P&E HR.

Refer to the Expenses Policy for claiming for eyesight tests and glasses required for DSE use. For further details please also refer to **COP Display Screen Equipment**.

3.10. DSEAR (Dangerous Substances and Explosive Atmosphere Regulations)

The College has procedures in place to ensure staff and learners remain safe and healthy in the working environment by the control of fire and explosion risks arising from the use of dangerous substances.

DSEAR applies if a dangerous substance is present (or is liable to be present) at the workplace and, the dangerous substance could be a risk to the safety of people because of fires, explosions or similar energetic events. For further information and guidance please refer to **COP DSEAR**.

3.11. Educational Trips and Off-Site Activities

All educational trips and off-site activities are to be assessed for any hazards and level of risk. For further information and guidance please refer to the Group Administration Educational Visits SharePoint portal: <https://activatelearning.sharepoint.com/sites/StudentTrips>.

3.12. Electrical Equipment

Periodic inspection and testing of the fixed electrical installation and periodic inspection and testing of portable electrical equipment will be carried out by appointed contractors. For further information and guidance please refer to **COP Inspection & Testing Of Electrical Equipment**.

3.13. Emergency and Disaster Planning

Procedures have been implemented to ensure foreseeable emergencies and disasters have been considered and practiced where appropriate and feasible. For further information and guidance please refer to the following Codes of Practice:

- Fire Safety
- Security and Emergency Procedures
- Disruption to Power and ICT (refer to Business Continuity Plan (BCP))
- Disruption due to weather (refer to P&E Weather Plan)

3.14. First Aid Arrangements

The College has appropriate First Aid provisions relevant to the work activity carried out and the number of employees located on the site. For further information and guidance please refer to the **CoP First**

Aid Provision, Accident and Incident Reporting and Investigation

3.15. Fire Safety Measures

Fire safety measures are co-ordinated for all Activate Learning sites by the P&E Manager and assisted by the Senior HS&E BP (Group Fire Safety Manager) and regional HS&E BP's. These include arrangements for:

- fire risk assessment,
- evacuation,
- provision and maintenance of fire related equipment (emergency lighting, fire detection and extinguishers, fire alarm systems, fire signage),
- training,
- record keeping.

Evacuations are managed by the HoCSE and assisted by the P&E Dept. Fire evacuation arrangements are detailed in separate procedures. On non-College owned sites, arrangements of the site controller are followed. For further information and guidance please refer to the **COP Fire Safety**.

3.16. Fluids and Gases under Pressure

All pipe work i.e. water (hot and cold), compressed air, and gas must be identified and clearly marked. Pipe work containing water (hot and cold), compressed air, and gas must be isolated and drained before any work is undertaken. Compressed gases must be used and stored as laid down in the manufacturer's guidelines and current legislation. For further information and guidance please refer to the **COP Pressure Systems**.

3.17. Health & Safety Consultation

The College has a regional HS&W Committee (Surrey, Berkshire and Oxfordshire) which meets in December and July. Outstanding actions from the regional meetings are reviewed by the H&S Board. Minutes of the meetings are available on the HS&E website. In addition, the HoHS&E produces a summary report and dashboard (Dec and July) and a full HS&E report in Sep/Oct reviewed by the GET and Corporation. HS&W is also to be regularly reviewed on College management and team meetings. Access to the HS&W Policy is available to all employees and learners on the College SharePoint portal. A hard copy of the General Statement of Intent will also be on display on the HS&W noticeboards located near to Reception.

3.18. Health, Safety & Environment Monitoring, Reporting and Review Performance

HS&E is regularly reviewed by the H&S Board, HS&W Committees (please refer to terms of reference), by departmental managers, HS&E BP and HoHS&E. HS&E monitoring (inspections, audits and spot checks) will be carried out at the appropriate intervals as detailed within the audit & inspection programme. Where a significant hazard or deficiency is identified the H&S Board will be notified ASAP. Progress against the HS&E Action Plan will be reviewed by the HS&W Committee not less than once a year. Further details are found in **COP Performance Measurement and Review Procedure**.

3.19. Health & Safety Training & Induction

All new starters will receive appropriate induction from their Manager regarding H&S relevant to their area of employment, including instructions on the College fire and emergency procedures and accident reporting. Details of training provided will be recorded and made available on request.

All employees are required to complete the relevant mandatory on-line HS& training. Campus Cords, Duty Directors and HoCSE and Fire Wardens are also required to complete additional training with the HS&E BP's. Fire Wardens are responsible for familiarising themselves with the College's emergency procedures.

3.20. Hot Work Operations

This is defined as a temporary operation with a tool at such a high temperature that could create a fire, irrespective of whether the work is done by an employee or by a contractor. Examples are welding, brazing, soldering, 'hot' cutting (e.g. Oxy-Acetylene Cutting) or grinding.

Hot Works carried out by contractors or college staff will be done so under the control of a [Permit to Work](#) issued by the P&E Department unless it is part of a regular course of training for learners.

For further information and guidance please refer to the **COP Safe Systems of Work** incorporating Confined Spaces, Hot Working and Construction and Excavation.

3.21. Intoxicants and Drug Abuse

Admission to the premises may be refused to any staff or learner where there is reasonable suspicion that they are incapable of performing their duties/studies as a result of intoxicants or drugs. If an employee's doctor has prescribed medication which may influence their ability to perform their duties, then they are required to register this with their Line Manager or HRBP. The employee may be required to undertake an Occupational Health assessment. For further guidance please refer to the **HR policy on Misuse of Drugs**.

3.22. Legionella

As the legal 'Duty Holder'², the CEO shall appoint a person in writing to take day-to-day responsibility (the Responsible Person) for controlling any risk from legionella bacteria. The Director for Group Facilities Operations is the Responsible Person (Legionella Operations). The Property & Environment Manager is the Deputy Responsible Person (Legionella Operations) and shall have sufficient authority to act on behalf of the Duty Holder. For further information and guidance please refer to the **COP Legionella Management and Control Plan**.

3.23. Lone Workers

This procedure should be implemented whenever there is an occasion that an employee may have to work by themselves and a specific risk assessment produced. From the risk assessment a Safe System of Work should be implemented. The system should include checks on the lone worker at regular intervals either by telephone, email or other appropriate means. For further information and guidance please refer to the **COP Lone Working**.

3.24. Machinery and Equipment

Employees and learners should only use machinery or equipment for which they have been trained and must do so in accordance with the manufacturer's guidelines and any formal safe system of work and/or procedures in place.

Machinery or equipment designed to be used in conjunction with any guard must not be operated unless that guard is in place. All guards, interlocks and other safety devices are to be checked by the competent user of the equipment and/or the room technician prior to its use.

For further information and guidance please refer to **COP Work Equipment Use and/or Lifting Operations and Lifting Equipment**.

3.25. Management of Contractors and Visitors

The safety of contractors and visitors, whilst they are on the premises, is the responsibility of the member of staff who sponsors the visit (Host). It is the responsibility of the sponsor/host to warn visitors of any known hazards to which they may be exposed to whilst at work on the site. For further information and guidance please refer to **CoP Management Of Visiting Workers / Contractors**.

Reception or the person responsible for receiving visitors to site (host), will ensure that the visitor enters their details in the visitor's book. The host or their deputy, where applicable will escort the visitor(s) from reception to their office or meeting room. Known and approved Visitors, Contractors or Suppliers are permitted unaccompanied access after an appropriate member of staff has received them into the building and provided an acceptable level of induction. In the event of an evacuation from the premises the Host must ensure that visitors are escorted to a fire assembly point, if safe to do so. If the visitor is missing, then the Duty Manager should be made aware of this.

3.26. Manual Handling Operations

All staff are required to complete the online H&S Risks & Responsibilities training which includes an element referring to manual handling training. Additional practical training will be provided to staff where regular manual handling operations is routinely conducted. The College will provide appropriate mechanical handling equipment to reduce or eliminate risks where possible. For further information and guidance please refer to **COP Manual Handling Operations**.

3.27. New and Expectant Mothers

An Expectant Mothers' risk assessment will be completed once the employee/learner has advised the College that they are pregnant. The risk assessment will be reviewed at appropriate intervals throughout the pregnancy and upon their return to work/learning after their maternity leave. Facilities will be made available for pregnant employees/learners if they are feeling unwell or need to rest. For further

² L8 HSE Approved Code of Practice Legionnaires disease

information and guidance please refer to **COP Management of Risk Procedures**

3.28. Noise and Vibration at Work

Managers are responsible for ensuring that their staff are not exposed to excessive noise or vibration in the workplace and shall reduce exposure through the use of technical engineering solutions and management controls. If as a last resort after all other control measures have been deemed insufficient it is identified that staff are required to wear hearing protection (noise safety) or gloves (vibration) then it is to be suitable and provided at no cost to the employee.

The regional HS&E BP is the designated Hearing and Vibration Protection Officer and should be notified if it is believed that an activity or an area may require a Noise or Vibration Assessment. For further information and guidance please refer to **COP Noise and Vibration at Work**.

3.29. Occupational Health, Health Surveillance and Monitoring

The occupational environment and health of employees will be monitored where appropriate to ascertain that their well-being is not impaired by the working conditions. The Occupational Health (OH) provider will carry out routine referrals, health checks, assessments etc. HS&E BP's will conduct routine Noise Assessments, Air Quality Assessment of workplace areas and DSE Assessments. Managers wishing to refer employees to OH should contact HR to make an appointment. For further details refer to **COP Health Surveillance**.

3.30. Personal Protective Equipment (PPE)

Managers will ensure that the correct PPE is available to staff, that it is kept in a good condition and replaced, as necessary. PPE will be freely available to staff as required, along with the appropriate level of training in its use. For further information and guidance please refer to **COP Use and Management of PPE**.

3.31. Restricted Access

All areas of high risk e.g. boiler and plant rooms, must be appropriately identified to prohibit unauthorised entry. Areas identified as restricted access must always be adhered to, and only those persons authorised may enter these areas. Specific areas at each college requiring a Permit to Work to access is to be signed 'Hazardous Area - No Access without a Permit to Work'.

3.32. Risk Assessment

A crucial part of a good safety management system is hazard identification and risk management to ensure adequate control. It is the responsibility of all managers to ensure that risk assessments are carried out by competent personnel within their areas of responsibility. Copies of completed and signed risk assessments will be added to the risk assessment database on the HS&E portal. For further details on the risk assessment process please refer to **COP Management of Risk Procedures** or to the appropriate stand-alone guidance i.e. risk assessing Working at height within **COP Working at Height**.

3.33. Safe Systems of Work (SSoW)

Formal SSoW will be developed by managers, with the assistance of the HS&E BP and P&E Manager where applicable, to cover potentially hazardous/dangerous operations in areas under their control. Managers and P&E will be responsible for ensuring that work is carried out in accordance with these SSoW. For further information and guidance please refer to **COP Safe Systems of Work**.

3.34. Smoking

Activate Learning does not permit smoking inside any of its owned or managed buildings or vehicles. Except for in 'designated smoking areas', which are clearly identified, Activate Learning does not permit smoking externally, across any of its estate. For further information please refer to the **CoP Smoke Free**.

3.35. Substances Hazardous to Health (including Biological and Viruses). Managers whose departments purchase hazardous substances will ensure that a Material Safety Data Sheet is obtained from the manufacturer or supplier for the product. If any doubt exists as to whether the product is classified as hazardous please contact the manufacturer or the HS&E BP. Substances identified as hazardous should not be used until a COSHH risk assessment has been completed, and appropriate training and information has been provided. For further details please refer to the guidance on **COP Control of Substances Hazardous to Health (COSHH)**.

3.35.1 Coronavirus (COVID19) Pandemic. Safety Guidance (SG01) and the overarching COVID risk assessment (SG01, SG02 and SG07) details specific arrangements and designated responsibilities for managing all aspects of the College's operations during the pandemic and is disseminated to all staff.

Those arrangements and responsibilities do not negate the requirement to adhere to the provisions within this Health and Safety Policy.

3.36. Vehicles, Mobile Phones and in-vehicle technology

All staff driving personal vehicles for college use must have the appropriate UK driving license and vehicle insurance (Business use), please refer to **COP for Workplace Transport**. Mobile Phones should not be used when driving due to their distracting nature. Fully, hands free in- car communication systems are approved.

3.37. Welfare Facilities and Wellbeing

The provision of welfare facilities is a legal requirement. The wellbeing of staff is a moral requirement as well as in some cases a legal requirement. Please refer to the [HR Wellbeing SharePoint portal](#) for further details.

3.38. Workplace Transport.

Our aim is to ensure a safe vehicle and driver environment, as appropriate across its sites. In particular, where reasonably practicable, we will ensure that there are adequate management controls in place to carry out suitable and sufficient assessments for all vehicle operation types, that control measures are in place, and that these are continually monitored and reviewed in order to minimise or if possible eliminate foreseeable transport related hazards. For further information and guidance please refer to **COP Workplace Transport and Traffic Management**.

3.39. Working at Height (W@H)

W@H is defined as work in any place where a person could fall from a distance which is liable to cause personal injury. Where W@H cannot be avoided a risk assessment should be completed. A SSoW should then be implemented and adhered to. Roof Access – No access is permitted to any roof area without the authorisation and agreement of the P&E Manager who will agree a SSoW and will issue a PtW if necessary. For further information and guidance please refer to **COP Working at Height**

3.40. Work Experience Placements.

Legislation places the responsibility on Employers to maintain the health, safety and wellbeing of learners under their temporary employment as they would do for their standard employees. We maintain our Duty of Care to providing a suitable and safe environment through a process of inspection and monitoring of the employer. This process is explained further in the **WEX Policy - The Management of Health and Safety of Work Experience Placements**.

3.41. Young Person(s)

Young Person(s)³ will be provided with a higher level of training, information and supervision considering their inexperience, lack of awareness of existing and potential risks and their immaturity. Risk Assessments of activities involving Young Persons will need to be suitable and sufficient with young persons considered. Refer to **COP Management of Risk Procedures**.

³ HSE classifies Young Persons as those under 18yrs and a Child as those under 16yrs.