



HEALTH & SAFETY POLICY

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Brighton Forward is committed to reviewing its policies and good practice annually.

Reviewed by: Laura Vallone and Romolo Pogg
Review date: 24th October 2025
Next review: October 2026

INTRODUCTION

Part 1: Statement of intent

1.1 Brighton Forward Ltd recognise and accept their responsibility to provide, as far as is reasonably practicable, a safe and healthy working environment for all its employees, students, and other people who use its premises, in accordance with the Health and Safety at Work etc Act 1974 and its associated regulations.

1.2 Our approach to Health and Safety is based on the HSE's document 'Managing for Health and Safety' (HSG 65) whereby emphasis is placed on the following key components:

1.3 Brighton Forward recognise the importance of developing a positive Health and Safety culture, and to ensure this is achieved Health and Safety is actively promoted and encouraged throughout the organisation through the provision of information, training, instruction and supervision.

Employees are openly encouraged to report hazards, including near misses, without fear of reprisal to ensure the root causes of accidents are identified thus enabling measures to be put in place to eliminate recurrence.

1.4 Responsibility of effective management ensures a systematic approach to the identification of risks and the allocation of financial and physical resources to control them. In addition, focus is placed on the 'total loss approach' which is based on research into causes of accidents whereby effective prevention and loss control has to focus on the causes of incidents because it is recognised that outcomes may be random and uncontrollable.

1.5 Brighton Forward will ensure that all employees and learners are developed regarding their capabilities and competencies in Health and Safety, have appropriate supervision arrangements, work and learning environments which are healthy and safe, are not exposed to undue risks when performing tasks, and those undertaking work experience are placed with safe employers.

1.6 In order to deliver these responsibilities, Brighton Forward will, so far as is reasonably practicable:

- Provide equipment and systems of work which are safe and without known risks to health;
- Ensure safe arrangements for the use, handling, storage and transport of articles and substances;
- Provide sufficient information, instruction, training and supervision to enable employees to avoid hazards and to contribute positively to the health and safety of themselves and others whilst at work;
- Maintain a safe and healthy place of work with safe access and egress;
- Provide adequate welfare facilities;
- Ensure that all relevant safety legislation, regulations and codes of practice are observed and the legal requirements met;
- Ensure that risk assessments are being carried out on an ongoing basis with employees participating in the risk assessment process. Assessments will cover the College's undertakings and will assist in the identification of

hazards and the setting of prioritised objectives for elimination and reduction of risk.

1.7 The Managing Director takes overall responsibility for Health and Safety including the formulation, development and implementation of the Health and Safety Policy within the College and expects the co-operation and support of all managers, employees and learners in its implementation.

Part 2: Organisational responsibilities

2. Introduction:

2.1 The Managing Director is committed to establishing a proactive approach to Health and Safety across the College sites. An important part of this is the clear definition of responsibilities and relationships which promote a positive Health and Safety culture. In this way the implementation and continued development of the Health and Safety Policy and supporting documentation will form an integral part of the management process.

2.2 Brighton Forward aims to fulfil its obligations to meet all relevant Health and Safety legislation requirements and organise its activities to ensure full compliance.

2.3 Responsibility for Health and Safety lies with all individuals (management, staff at all levels, students and visitors). The responsibilities and duties assigned below identify the policy makers, planners and implementers.

3. The Managing Director (MD)

The MD will:

3.1 Be responsible for the management of Health, Safety and Welfare in the College.

3.2 Receive reports, and where applicable, recommendations from the Health and Safety Manager and/or staff members, and ensure that through the delegation of authority College Policy is effectively implemented.

3.3 Identify Managers and other competent persons to delegate certain specific duties to ensure the safety of employees and others who use College premises including:

- i) undertaking risk assessments relating to key tasks, which include the use of equipment, hazardous substances and methods of working;
- ii) establishing, maintaining and monitoring safe working practices;
- ii) safety inspections of the premises, plant and work activities, and ensuring that workplaces, work equipment and the control and use of substances comply with relevant statutory standards;
- iv) identification and implementation of appropriate health and safety training programmes for staff;
- v) the provision of information to employees and others to ensure their health and safety;

vi) ensuring that, where appropriate, health surveillance is provided and undertaken;

vii) the recording, reporting and investigation of accidents and incidents in the workplace.

4. Senior Managers (Programme Lead and Site Leads)

Senior Managers will:

4.1 In the absence of the MD, assume the responsibilities as outlined above.

4.2 Be appointed by the MD to become the nominated lead person for the overall management of each site; generally, this will be the responsibility of the Lead Facilitator who is based at the specific site. The appointed Lead Facilitator will be responsible for working with the Health and Safety Manager to ensure that fire safety procedures and appropriate first aid arrangements and trained staff are in place; also that the site is in a generally sound Health and Safety condition.

4.3 Ensure that all staff, volunteers and visitors under their control are fully aware of their Health and Safety responsibilities, and support them in the carrying out of their duties.

4.4 Make themselves familiar with any documentation and/or policy and/or instruction referring to the Health and Safety arrangements for staff, accommodation, maintenance or operation of that area of work.

4.5 Ensure that the Health and Safety checklist is completed on a termly basis.

4.6 Ensure appropriate and adequate risk assessments are carried out within their sphere of work and responsibility, for rooms used and work practices and processes. Ensure that records of these assessments are kept and made available to staff and their representatives. They will also ensure that, where hazards are identified, appropriate action and advice is taken to remove or minimise such hazard or risk to the Health and Safety of any person under their control, and that all plant and machinery under their control is regularly inspected and maintained, and records kept in accordance with relevant statutory provisions.

4.7 Notify the Managing Director and Programme Lead in sufficient time to ensure they conduct risk assessments of workplaces used by students on work experience, prior to the placement.

4.8 Provide for all their staff the details of the organisation and arrangements for safety relating to:

i) the specific workplaces and working activities undertaken;

ii) the specific plant, equipment, materials and substances in use;

iii) any related hazards, and

iv) the effective planning, control, monitoring and reviewing of the preventative and protective measures. Arrangements may include safety

advice and safety rules. Where safety rules apply, any infringement may result in disciplinary action.

4.9 Ensure the Managing Director and Programme Lead are notified when new methods, equipment or changes are being considered or planned.

4.10 Seek and use safety advice, identify competent persons to undertake suitable and sufficient workplace risk assessments, and ensure that such competent persons are provided with sufficient time, training and resources to enable them to undertake their duties effectively.

4.11 Ensure that all staff under their control are aware of first aid facilities, evacuation of premises and other emergency procedures, appoint Fire Wardens/Sweepers and ensure that agreed procedures on the reporting of accidents, dangerous occurrences and accident investigation are followed.

4.12 Ensure that all managers and staff under their control are fully aware of their Health and Safety responsibilities, and support them in the carrying out of associated duties.

4.13 Ensure that suitable and adequate personal protective equipment (PPE) and storage facilities, where appropriate, are made available or obtained for identified staff, and ensure that personal protective equipment is properly used and maintained.

4.14 Ensure that all staff receive suitable training or are adequately trained in Health and Safety in relation to their duties, including offsite visits and activities.

4.15 The Programme Lead will ensure that programmes of study include a Health and Safety induction and Health and Safety content as appropriate.

4.16 Ensure the Careers Lead has been notified of learners' work placements in order that appropriate risk assessments can be undertaken prior to any placements commencing.

4.17 The Careers Lead will ensure, when approving work placements of students, they are satisfied with the establishment's safety policy and that the student will receive sufficient information, instruction, training and supervision and that the work experience will be gained in a safe and healthy environment.

4.18 The Programme Lead and Lead Facilitators will be responsible for the provision of resources as appropriate and, so far as is reasonably practicable, to implement the College Health and Safety Policy.

5. Health and Safety Manager:

The Managing Director will:

5.1 Provide necessary advice and assistance to the Senior Managers to enable the College to fulfil its requirements and avoid prohibitions imposed by the relevant statutory provisions. This appointment does not absolve those members of staff undertaking a management or supervisory function from their duties and responsibilities expressed by the Health and Safety at Work etc. Act, 1974 and associated Regulations.

5.2 Formulate, disseminate and monitor appropriate health and safety policies in relation to risk assessment, first aid, and other relevant health, safety and welfare matters to enable the College to fulfil its requirements and prohibitions imposed by the relevant statutory provisions, and that such policies are revised as may be necessary from time to time.

5.3 Identify and implement appropriate health and safety training programmes for staff, including the keeping of statutory records.

5.4 Ensure that adequate first aid equipment and facilities including the training of personnel in first aid, are provided and that such arrangements are published to all staff and suitably displayed on all sites.

5.5 Ensure that policies for the reporting of accidents, dangerous occurrences, accident investigation and the evacuation of premises and other emergency procedures are in place, and ensure that such procedures are disseminated to managers and staff.

5.6 Ensure, in liaison with Senior Managers, the effective planning, control, monitoring and reviewing of preventative and protective measures. The Health and Safety Manager will also ensure that, where appropriate, health surveillance is provided and undertaken.

5.7 Liaise where necessary with the County Fire Services, and keep fire precautions and procedures under review.

5.8 Provide safety advice to managers, employees and students, and identify competent persons to undertake suitable and sufficient workplace risk assessments.

5.9 Advise the Careers and Employability Manager of relevant changes affecting the undertaking of work placement risk assessments.

5.10 In liaison with the Learning Resources Manager, obtain all relevant Health and Safety publications and ensure a Health and Safety reference section is maintained in the College library or available to staff and students electronically.

6. Site Manager:

The Site Manager will:

6.1 Work with the Managing Director to ensure that the evacuation of premises and other emergency procedures are in place, and ensure that procedures for evacuation are disseminated to managers and staff on their site. They will also act as the Emergency Officer under such procedures, and ensure a deputy (generally the designated Duty Manager) is appointed to take charge in their absence.

6.2 Work with the Managing Director to ensure the effective planning, control, monitoring and reviewing of preventative and protective measures on their site. They shall also ensure the provision of information to employees and others to ensure their health and safety.

6.3 Ensure, in consultation with Site Manager and staff that defects and hazards observed or reported in the fabric of the premises or fixed installations are recognised and that appropriate action is determined.

6.4 Ensure that no building work is carried out on the premises without first consulting with the Managing Director and receiving their approval for the proposed works.

7. College Employees

All College employees will ensure that they undertake the work they are required to complete with due regard for the safety of themselves, their colleagues, students and the general public, and will:

7.1 Take reasonable care for their own health and safety and that of other persons that may be affected by their acts and omissions at work.

7.2 Cooperate fully with the College in all matters, rules, advice and instructions on health and safety matters and comply with all relevant statutory provisions; failure to do so could lead to disciplinary action.

7.3 Ensure that appropriate personal protective clothing and equipment (PPE) is used where necessary by themselves and by students in their charge.

7.4 Report any defect or hazard involving equipment, systems or procedures to their line manager.

7.5 Report any defect or hazard involving buildings through the established College reporting procedure.

7.6 Report accidents or near misses in accordance with the established College procedure.

7.7 Ensure that students in their charge have clear safety instructions affecting the use of equipment, substances, materials and processes.

8. Students

All students will:

8.1 Comply with all safety regulations and instructions and take reasonable care for their own health and safety and that of other persons who may be affected by their acts and omissions whilst on College premises or whilst involved in College course activities.

8.2 Ensure that appropriate personal protective clothing and equipment is used where specified as necessary by a lecturer or other member of staff.

8.3 Report all accidents immediately to a member of staff.

8.4 Report any hazard observed immediately to a member of staff.

8.5 Not deface, damage, interfere with or remove any sign or equipment provided for health, safety or welfare purposes. It is College policy to take disciplinary action against and/or prosecute offenders.

9. Visitors:

9.1 The Organisation accepts its responsibility towards members of the public and visitors and will ensure, in conjunction with any additional licensing regulations where applicable, that so far as is reasonably practicable, adequate provision is made for their health and safety when using or visiting College premises.

9.2 Visitors and other persons working on College premises must observe the health and safety rules and instructions laid down in the College Health and Safety Policy and those intending to work will not be permitted to do so until they have accepted such relevant rules.

9.3 Any contractor or sub-contractor employed to carry out work for the College will be required to operate to standards of health and safety not less than those set out in this policy, and to supply copies of their company's Health and Safety Policy with safe working procedures and appropriate risk assessment documentation, prior to commencing work.

9.4 It will be the responsibility of contractors when working for the College, on or about College premises, to take all necessary steps to ensure not only the health, safety and welfare of their own employees and subcontractors, but also to protect other persons not in their employment who may be affected by any works under their control. Such persons may include the occupants of any premises including employees, students and all other visitors. They are required to discuss with the individual Site Manager any risks associated with the work and provide details of any assessments. Any contractor undertaking hot works must ensure that a permit to work is obtained from the Managing Director prior to the commencement of work.

9.5 All visitors will be issued with a Visitor Information Card on signing in at Reception.

Part 3: Health and Safety Arrangements

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The following section provides a summary of the systems and procedures in place within the College. This is not an exhaustive list and current arrangements will be updated as necessary; in addition, guidance on new arrangements will be produced.

3.1 Information on Health and Safety:

It is the responsibility of the Managing Director and Programme Lead to ensure the contents of all the College's policies and procedures are brought to the attention of staff and students. Staff must cooperate with the Managing Director and Programme Lead by familiarising themselves with the College's policies and procedures, especially with regard to safe systems of work, which affect their daily working activities.

Health and Safety information will be available via:

- Notice boards
- Electronic systems such as the Intranet and Bulletin Board etc
- Direct Instruction and Training
- Posters
- Staff and Students Voice Meetings

All new staff will be briefed on health and safety matters through the induction programme and refresher training will be provided as required.

Specific health and safety queries should, in the first instance, be raised through line managers or via the Managing Director and Programme Lead.

3.2 Risk Assessment:

The Management of Health and Safety at Work Regulations 1999 require that suitable and sufficient risk assessments are undertaken, so that significant hazards can be identified. It is the responsibility of Senior Managers to ensure that these are carried

out and that there are sufficient members of staff within their departments trained in the risk assessment process.

When undertaking risk assessments consideration must be given to specific Health and Safety documentation e.g. Regulations, Approved Codes of Practice, Guidance, and recognised commercial customs and practices.

Each department will keep records of assessment carried out and review them annually or sooner if there is a requirement to do so. Before any new equipment or systems are put in place a risk assessment will be carried out.

It is crucial to the process that immediately following a risk assessment an action plan is produced in order to ensure safety in the workplace. This will detail the action(s) that need to be taken to reduce the level of risk and the person who is responsible for ensuring implementation of the control measures.

Where the control measures involve personnel using dangerous machinery or hazardous substances in a specific way to avoid the risk of injury or ill-health, the Senior Manager for the department must ensure a Safe Working Procedure is written; its details must be communicated to all users and records relating to any information, instruction or training provided must be kept.

3.3 First Aid:

Each site will have sufficient numbers of qualified First Aiders and an adequate number of first aid boxes as required under the Health and Safety (First Aid) Regulations 1981.

It is the responsibility of Site Leads to ensure that there are sufficient numbers of suitably trained personnel in their areas, these numbers will be identified through a needs assessment carried out by the health and safety department and the information shared. A copy of the responder list will be kept at each site.

In the event of a member of the public, student or member of staff sustaining an injury the incident must be referred to a First Aider for attention, recorded, and if the person's condition is serious and requires further medical aid an ambulance should be called via the 999 system.

A record of every incident involving the intervention of a First Aider must be recorded on the College's Incident/Accident Report Form and submitted via their Department Head to the Health & Safety Manager. The report forms can be in the staff shared drive.

3.4 Accidents involving Blood or other Body Fluids

Accidents involving blood, e.g. cuts, nosebleeds, etc. carry the danger of Hepatitis B, HIV (AIDS), etc. If possible the injured person should put pressure on their wound or nose themselves to stop the bleeding. The following points should be observed:

- Getting blood on yourself or on other people should be avoided;
- Disposable gloves should be used;
- Disposable paper towels or tissues to mop up spillage should be used, generally either by a First Aider or a cleaner;

- Surface should be wiped with cleaning agent;
- All contaminated material should be put into a yellow plastic bag, which should be tied up and placed into the appropriate waste bin.

3.5 Needle Safety:

In the event of a discarded hypodermic needle being found on College premises it is essential that the incident is reported immediately to the Site Manager.

The Site Manager or delegated member of staff will ensure its safe disposal. Students must not touch the needle.

The incident should be reported in accordance with the Incident/Accident Report procedure.

3.6 Accident Reporting/Recording

It is a legal requirement that all accidents are recorded and all injuries to staff, learners, visitors and contractors must be reported in accordance with the College's Incident/Accident Report procedure.

Minor accidents, not involving blood or burns, should be recorded in the Accident/Incident Record book. This can be found in both offices next to the main desk.

Minor accidents, involving blood need to be recorded on the Accident form and recorded on the College's MIS Bromcom. The Managing Director and/or Programme Lead will be notified and parents/carers will be contacted by Leads as soon as is practically possible.

All Incident/Accident Report Form must be completed and submitted to the Managing Director and/or Programme Lead.

In the case of a notifiable accident or disease as specified under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) 2013, the Managing Director must be notified immediately or at the earliest possible moment. Accidents necessitating the absence from work for more than seven consecutive days (not including the day of the accident) should be recorded and reported to the Health and Safety Executive.

The Managing Director will normally report such incidents to the Health and Safety Executive (HSE). However, if they are not available the Programme Lead will contact the HSE on **Tel: 0345 300 9923 (Incident Reporting Centre)**. A summary of incidents requiring reporting under RIDDOR is available on the HSE website.

All reportable accidents will be investigated to determine the exact cause(s) and ensure measures are put in place to reduce the possibility of recurrence. Assistance with investigating more serious incidents/accidents should be sought from the College's Managing Director and Programme Lead.

3.7 Evacuation Procedures and Fire Precautions

All staff, students, visitors, and contractors are required to evacuate premises on the sounding of a fire alarm. Records must be kept of all evacuations, including tests and false alarms. At least one emergency evacuation practice per academic term must be carried out in each site.

It is the responsibility of the Managing Director to ensure that firefighting equipment (extinguishers, hoses, blankets, etc) is regularly checked, and means of raising the alarm and signage have not been tampered with or damaged in any way. The servicing of fire and security alarm systems and of firefighting equipment is part of a planned maintenance programme. Servicing records must be kept and made available upon request.

The Managing Director is responsible for making certain that all alarm systems (fire, intruder) are regularly tested and logged.

Fire alarms should be tested on a weekly basis to ensure that the warning systems function properly and these tests are logged in **the Fire Safety handbook** situated in: Worthing – on the shelf by the main desk in the office, and Shoreham – next to the fire alarm panel on the all outside the office.

Defective alarms should be reported immediately as an emergency repair.

The firefighting appliances and appliance points should be checked on a regular basis to ensure the equipment has not been moved or tampered with in any way.

Lead Facilitators will ensure there are enough trained fire wardens within their areas to aid effective evacuation in the event of an emergency.

Means of escape routes, fire exit points from the building and emergency doors should be checked on a regular basis by the Lead Facilitators to ensure they are free from obstruction and that all access doors from the building can be easily opened.

All doors on escape routes and final exit doors must be kept unlocked during occupation of premises.

In accordance with the Regulatory Reform (Fire Safety) Order 2005, the Lead Facilitator at each site has been designated the 'Responsible Person'; the Managing Director and Programme Lead have been designated the 'Competent Persons'. The Lead Facilitator with the Site Manager will be responsible for ensuring fire risk assessments are carried out and reviewed as required.

Fire Wardens are trained annually and are: Worthing site – Emma Kelly, and Shoreham site – Kasia Beasley.

3.8 College Lockdown Procedure

A lockdown of college buildings is an emergency procedure designed to secure and protect staff and students. This should be seen as a sensible and proportionate response to any external or internal incident, which has the potential to pose a threat to the safety of people in the College.

The aim of lockdown is to prevent people moving into danger areas and preventing or frustrating any intruders accessing the site. The lockdown procedure should be used when it may be more dangerous to evacuate buildings than to remain inside. Procedures should aim to minimise disruption to the learning environment whilst ensuring the safety of all.

3.9 Control of Substances Hazardous to Health (COSHH)

The Control of Substances Hazardous to Health Regulations (COSHH) 2002, require that an assessment be made of the risks involved in using hazardous substances. If there is a risk, a non-hazardous substance should be substituted, if one is available. If not, then appropriate control measures including a safe system of work should be drawn up, disseminated to all users and training records kept. Information required for all users includes:

- The potential health effects of the substance;
- The possible route of entry into the body;
- The correct control measures to be followed;
- Any safe working procedures to be followed;
- Any specific handling, storage and disposal procedures to follow;
- Use of any Personal Protective Equipment;
- What to do in case of accident, spillage, etc. and
- Possible medical effects of over exposure.

The Managing Director and Programme Lead are responsible for ensuring a COSHH risk assessment is undertaken, where appropriate, in their area and that everyone who uses these substances is informed about, as well as instructed and trained in, their use. Regular monitoring and review of the arrangements are required.

In situations where staff/students are working with hazardous substances which are classed as sensitising agents, or where they are undertaking activities which, for hygiene purposes, require the use of disposable gloves, it is the policy of the College that **latex free gloves** are used e.g. Nitrex accelerator free – non latex gloves; under no circumstances should latex gloves be used within the College. The Department Manager is responsible for ensuring the above is carried out.

Where staff/students have to use hazardous substances, the above-mentioned safe systems of work must be drawn up and made available (e.g. by display) to all who use them.

Where specific tasks have been contracted out e.g. catering, Contractors are responsible for providing COSHH information and training for their employees. However, it is the duty of the appropriate manager to bring it to the Contractor's notice if COSHH arrangements are not being adhered to (e.g. cupboards containing harmful substances not being locked) as others are being put at risk.

Inflammable substances and compressed gas cylinders must be correctly stored and used.

3.10 Electrical Safety

The Electricity at Work Regulations 1989, require a safe system of work to be adopted by each premise and which will include having:

- all fixed installations tested at least every 5 years (rolling annual programme);
- a certificate of the test of fixed installations;
- an inventory of all electrical apparatus/appliances;
- a record/log of inspections and annual tests;
- all portable appliances tested by a “competent” person using a portable appliance tester in accordance with current legislation;
- all portable appliances in service for over one year must display a certificate indicating that PAT testing has been undertaken. Any failed appliance must be taken out of service and either repaired or disposed of.

Staff are encouraged to visually inspect the portable appliances they use and to report any damage or wear that they find. A visual inspection would involve checking the plugs, casings and cables looking for damage, cracks, fraying, wire exposure, etc.

Personnel must not use portable electrical appliances brought in from home on College premises unless each appliance has been PAT tested prior to use. PAT testing can be arranged through the Site Manager.

3.11 Gas Safety

Maintenance and servicing will be carried out as part of the annual planned maintenance programme. In the event of an emergency involving gas, an announcement shall be made, the building will be evacuated (N.B. the alarm system for the building will not be used for this purpose) and the gas provider contacted. **If it is safe to do so**, the Site Manager will arrange to turn off the mains gas supply to the building.

3.12 Air Conditioning

The inspection and testing of air conditioning installations will be part of the annual Planned Maintenance Programme. If an installation fails to operate, or does not operate effectively, it will be closed down pending repair. Service records relating to systems should be kept on the premises.

3.13 Plant, Machinery & Equipment

All fixed installations should be inspected and tested as part of the annual planned maintenance programme or as per the statutory requirement. Other equipment e.g. photocopiers, etc. are serviced/ maintained under contractual arrangements. Service records relating to the maintenance and servicing of all plant, machinery and equipment should be kept on the premises. The Lead Facilitator is responsible for ensuring the above is carried out in liaison with the Site Manager.

3.14 Smoking

In accordance with the Smoke Free Regulations 2007 smoking is not permitted within any College building, for the sake of the Policy this includes all vapour E-Cigarettes. There are no designated smoking areas on or around either site. Reference Brighton Forward’s Alcohol and Substance Misuse Policy.

Personnel found smoking in non-designated areas will be asked to move or extinguish their cigarette; persistent offenders will be dealt with through the College's disciplinary procedure.

3.15 Display Screen Equipment (DSE)

The Health and Safety (Display Screen Equipment) Regulations 1992 apply to 'Users' of Visual Display Units (VDUs). A 'User' is defined as somebody who uses a VDU as a significant part of their normal work (e.g. uses a computer for continuous spells of an hour or more on a daily basis).

The Managing Director and Programme Lead are responsible for identifying users within their departments and ensuring risk assessment and training is carried out for each user.

All staff complete on-line Display Screen Equipment (DSE) training. Any user who experiences ill-health issues which may be contributed to the use of DSE must complete an Incident/Accident Report Form and refer the matter to their line manager and the College's Managing Director.

3.16 Defect and Hazard Reporting

It is the responsibility of every employee and other persons using departmental premises to report, immediately, either to their line manager or the Site Manager any situation which has the potential for harm so that action can be taken to rectify the problem.

If there is immediate danger, steps should be taken, as required, to reduce the risk as far as possible until a more permanent solution can be found. Appropriate temporary action might include:

- A warning notice alerting people to the hazard
- Isolation of power to the hazard where possible
- Prevention or restriction of access to an area or piece of equipment
- Temporary closure of a facility or activity
- Erection of a barricade to prevent access to a danger area

The College upholds a policy of good housekeeping; in effect this means ensuring safe access and egress throughout all premises. Clear passageways must be maintained at all times throughout the buildings, on corridors, in public areas and offices to allow safe evacuation in an emergency and to avoid accidents by tripping.

Stairwells and under-stair areas must also be kept free of obstruction; they must not be used as storage areas as this constitutes an infringement of fire safety.

Good housekeeping also extends to storage areas, i.e. cupboards, shelves and storerooms. Site Managers will carry out regular checks to ensure such areas do not become hazardous by poor stacking or an accumulation of equipment, etc.

3.17 Contractors

It is an obligation of Contractors to comply at all times with the provisions laid down in the Health and Safety at Work etc. Act 1974. Where work is contracted through the

College, the Site Manager will take all reasonable steps to ensure Contractors comply with Health and Safety law. Also that they are not exposed to risks to their Health and Safety.

No manager shall engage contractors for provision of professional services within their area of responsibility without first notifying the Managing Director; all tendering and planning stages of all relevant Health and Safety legislation must be taken into consideration. In particular, in the absence of the Managing Director or Site Manager, the Lead Facilitator is to ensure that they establish on-site responsibilities and arrangements for the safety of employees, the public, and other persons who may be affected by the work being carried out. The Lead Facilitator should also make Contractors aware of the Health and Safety arrangements relevant to the premises to which they apply.

The Site Manager will ensure a person is designated to take responsibility as the project co-ordinator for the Contract, and must ensure that the Contractor is aware of their statutory obligations. The designated person must ensure that:

- The Contractor produces on request, their Company Health and Safety Policy and arrangements.
- Relevant Risk Assessments are carried out in connection with all aspects of the work to be undertaken.
- The Contractor provides Safe Systems of Work documentation and Permits to Work, relevant to the contract. This must include details of 'special arrangements' such as for 'hot working'.
- By their methods of working and policy arrangements, persons both in the Contractor's employment, employees of the College, and learners and other visitors who have access on or within the premises are not adversely affected by the Contractor's undertakings.
- The Contractor is made aware of the College's Health and Safety policies and arrangements, and that all persons working for the Contractor carry out their work in accordance with the requirements of these policies and arrangements.

Advice on the health and safety issues of contracts may be obtained from the Site Manager.

The College prohibits staff or students to participate in any work being undertaken by a Contractor.

3.18 Security:

In the absence of the Managing Director and Site Manager, the Lead Facilitators are responsible for ensuring that their premises are locked at the end of each day and the intruder alarm is set. The servicing of intruder alarms is part of the annual Planned Maintenance Programme.

Key holders will be called out in the event of the alarms being set off.

All staff and students have a responsibility to ensure appropriate measures are taken to safeguard materials and equipment in their care:

- Personal valuables should not be left unattended;

- Staff, students and visitors are to report to the Lead Facilitator upon entering the college.
- Lost or stolen keys or other property should be reported to the Lead Facilitator in the absence of the Managing Director or Programme Lead.
- The Police should be informed by the Lead Facilitator, in the absence of the Managing Director or Programme Lead of any thefts of departmental property and the crime number noted, and an Incident/Accident Report Form completed;
- Members of the public are responsible for their own property but in the event of a theft from a user of College premises, staff should facilitate reporting the incident;
- The Site Manager should be notified immediately if anyone is seen acting in a suspicious way;
- CCTV is installed in College premises and may be used as evidence by the Police in the event of a prosecution. The Site Manager and Managing Director are responsible for monitoring the CCTV system.

3.19 Unacceptable Behaviour

The College will maintain a policy on managing behaviour and it is committed to protecting staff and service users from persons using their facilities and services whose behaviour may cause disturbance, distress or disruption.

In the event of a person exhibiting unusual or threatening behaviour the Managing Director or Programme Lead should be contacted immediately. If the situation cannot be easily diffused, the Police should be contacted via the 999 system and requested to attend the College.

During evening periods, the Managing Director and/or Site Manager can be contacted via phone on 07379 062932.

Staff are not expected to put themselves at risk of physical injury in attempting to resolve incidents of conflict.

The College does not expect any member of staff or learners to be subjected to any form of verbal or physical abuse. Any member of staff or learner being subjected to such behaviour must report the incident to their line Manager who will ensure an investigation is carried out and appropriate action taken; an Incident/Accident Report Form or The Student Behaviour Policy Report Form must be completed and submitted to the Operations Manager.

3.20 Manual Handling/Safe Systems of Work

Care must be taken, when lifting, pushing or pulling, not to strain and run the risk of injury. The Managing Director is responsible for ensuring anyone who lifts regularly completes their manual handling training and risk assessment will be carried out. Details relating to Manual Handling training and risk assessment are available via the Managing Director.

In order to reduce the risk of injury staff should ensure they conform with the following:

- Storerooms, stock cupboards, etc. will be arranged in such a way that any risk of accident, injury or fire is reduced to a minimum, if not eliminated.
- Heavy items will be placed at a height consistent with a person's physical capacity to lift them up or down without risking injury i.e. not too high, or indeed, too low.
- Storage will be planned so that the lightest and smallest (and not the heaviest or most bulky) equipment, etc. is in the more out-of-the-way places.
- There will be appropriate means of accessing any high level storage, i.e. kick-stool or stepladders.
- Large or heavy packets can be split up to make carrying easier and safer.
- Stored items will be steady and firm, not precariously balanced or easily knocked over.
- Heavy items will not be stacked on top of each other unless they are very secure and not too high.
- There will be ease of access i.e. clear passage, to any stored items. Clutter will be cleared and extraneous materials disposed of.
- Stepladders used for storing will be regularly inspected to ensure that they are in good condition (especially wooden ones).
- All hazardous substances (see Section 3.9 COSHH above) and potentially dangerous equipment and instruments must be stored safely.
- Inflammable substances will be kept in metal containers and locked when not in use. A record of their whereabouts will be held centrally.
- Gas cylinders will be stored according to requirements.

3.21 Driving

All drivers of College vehicles should have their driving licences checked by the Managing Director and undergo training for competence and safety where necessary, e.g. minibus driving, this includes a driver assessment and instructions on undertaking basic safety and daily maintenance checks of the vehicle. Smoking is not permitted in any College vehicle.

Staff who use their own cars on College business must ensure they are appropriately insured and have a valid MOT, car tax and driving licence. HR will ensure arrangements are in place for the checking of driving licences on a regular basis. They should at all times adhere to the College Work-related Driving Policy.

3.22 New and Expectant Mothers:

Under the Management of Health and Safety at Work Regulations 1999, it is a legal requirement to conduct risk assessments for staff who are classified as 'new or expectant mothers' in relation to the tasks they perform. The college will take all reasonable steps to ensure that pregnant or breastfeeding staff members are not exposed to risks greater than those they would encounter outside the workplace.

Staff who become pregnant are required to notify the Managing Director in writing as soon as possible and provide a certificate from a registered Medical Practitioner or Midwife confirming the pregnancy. The Managing Director will formally request this documentation in writing.

Where risk assessments identify potential hazards that cannot be fully mitigated through usual workplace controls, and where adjustments to working hours or

responsibilities are not feasible, the Managing Director will take alternative measures to safeguard the health and safety of the employee and her child. These measures may include:

- Implementing additional protective measures or adjustments within the existing role to minimise risk as far as possible.
- Providing appropriate support and monitoring the situation closely.
- If risks remain significant and cannot be controlled within the current working arrangements, the employee may be granted leave until it is safe for her to return to work.

Professional advice, such as medical or occupational health guidance, will be sought as necessary to assess ongoing risks and ensure appropriate actions are taken. The Managing Director will regularly review the risk assessment and any control measures to maintain a safe working environment for the new or expectant mother.

3.23 Occupational Health:

The advice of an Occupational Health Nurse may be sought, usually following a period of prolonged absence or where a specific medical concern exists.

3.24 Health and Safety Training

The College recognises that Health and Safety training is an integral part of the overall safety policy. Induction training will be provided for all new staff and includes appropriate safety information and details of local policies and procedures.

Various Health and Safety courses are available through the College and staff are expected to attend specific courses which are relevant to their working activity. It is the responsibility of the Operations Manager to ensure that staff are trained. In addition, the Health and Safety Manager can provide staff training where a need has been identified.

The College targets Health and Safety Training as follows:

All staff are expected to undertake the on-line Health and Safety Training and associated assessment.

Mandatory E-Learning and assessment (where applicable) include:

- Healthy Working (DSE)
- Effective Risk Assessment
- Manual Handling
- Fire Awareness
- Safety for Line Managers

3.25 Auditing/Inspections

The Managing Director should ensure that safety inspections of their premises are undertaken each term, in conjunction with the Programme Lead, using the Termly Checklist as a record which is available on the staff share drive. Following inspections

an action plan will be devised if improvements are required; the Managing Director and Site Manager are responsible for ensuring the actions are undertaken.

The Managing Director and Site Manager will undertake a Health and Safety audit of premises every 12 months to identify any shortfalls and provide advice as necessary. This will be undertaken in consultation with the Site Manager and other members of staff who have Health and Safety responsibilities in specific areas.

3.26 Lone Working:

The Programme Lead will be responsible for ensuring risk assessments are undertaken for staff who work alone, either on-site or off-site, and for monitoring the arrangements that subsequently may need to be implemented. Further guidance is available via the Managing Director and the College Lone Working Policy.

3.27 Off-Site Activities:

The Managing Director and Programme Leads are responsible for approving Off-Site visits over all Brighton Forward sites. The Educational Visits Policy and supporting guide clearly lays out the procedure that staff follow when planning an activity. Primarily the following must be carried out in advance of a visit being undertaken:

- Risk Assessment of visit;
- Written parental consent obtained, where appropriate;
- Off-Site Activities Form
- First Aider(s) appointed and First Aid bag(s) obtained. available through
- Offsite leads will carry a college mobile phone which has parent/carer/student numbers in

Offsite Activities must be approved by the Managing Director and Programme Lead at least 7 days before the visit is due to commence. ***Failure to comply with this instruction could jeopardise insurance cover for all individuals on the visit.***

The student names can be submitted at a later date, once all attendees have been confirmed.

3.28 Temporary Workers

The College will provide any person who is employed on a temporary basis (agency/supply) comprehensive information in respect of:

- special occupational qualification or skills required by them in order to carry out their work safely;
- any health screening required under statutory provision in connection with their work activity;
- specific aspects of the work to be done (insofar as such aspects of the work are likely to affect their health and safety);
- details of the College's Health and Safety policies, procedures, risk assessments or codes of practice, or any such health and safety information which is relevant to their work activity or work location;
- appropriate information, training and instruction in connection with their duties, or any equipment or machinery to be used in connection with their employment.

3.29 Working at Height

All members of staff must ensure they comply with the Work at Height Regulations 2005 before commencing any work which involves working at height; facilitators are responsible for ensuring learners are not put at risk when they are required to work at height.

As defined in the Work at Height Regulations 2005, a place is 'at height' if (unless the Regulations are followed) a person could be injured falling from it, even if it is at or below ground level. This includes working off step ladders, low level platforms and kick stools.

The overall principle is that persons in charge must do all that is reasonably practicable to prevent anyone falling.

The Regulations set out a simple hierarchy for managing and selecting equipment for work at height.

1. Avoid work at height where possible;
2. Use work equipment or other measures to prevent falls where working at height cannot be avoided.
3. Where the risk of falling cannot be eliminated, use work equipment or other measures to minimise the distance and consequences of a fall should one occur.

The basic principles are:

- All work at height is properly planned and organised;
- All work at height takes account of weather conditions that could endanger health and safety;
- Those involved in work at height are trained and competent;
- The place where work at height is done is safe;
- Equipment for work at height is appropriately inspected;
- The risks from fragile surfaces are properly controlled, and
- The risks from falling objects are properly controlled.

In essence, before any work at height is undertaken a thorough risk assessment must be carried out and appropriate control measures put in place, which may include training and information.

3.30 Safe Use of Ladders

The Work at Height Regulations 2005, have not banned the use of ladders, step ladders or kick stools; however, a risk assessment must justify the use. The task must be of low risk, short duration (30 minutes), and within suitable site conditions.

The College complies with the recommendation by the HSE and DTI that Class 1/EN131 (industrial standard) ladders and stepladders are used in the workplace. Each ladder should be routinely inspected for no visible defects and there should also be a pre-use daily check. All operators must be competent in the use of ladders and should receive information, instruction and training.

The Site Manager is responsible for ensuring that all ladders are formally inspected on a regular basis, all users are trained in the correct use of ladders and that records are kept.

Basic principles of ladder safety include ensuring the ladder is at a 75 degree angle (1:4 base to height); the ladder must be placed on a level surface; both feet and one hand to be in contact with the ladder; and the operator should be standing at least 3 clear rungs from the top. When using step ladders ensure they are spread to their fullest extent; place steps at right angles to work; ensure the cords, hinges, swivels, and sliding joints are in good condition; never stand on the top step, the operator should be standing at least 2-3 clear rungs from the top dependent on design.

Further information regarding the safe use of ladders can be obtained from the College's Health and Safety Manager.

3.31 Work placement of Students:

Students who undertake work placements must have their working environments inspected by the Careers Lead that the placement is approved to host a student.

The Careers Lead will

- Undertake a reasonable risk assessment of the employer in accordance with the government guidance;
- Notify the Managing Director and/or Programme Lead that a risk assessment has been carried out and provide details of its outcome;

Note:

- If necessary, an action plan may have been left with the employer outlining work that may need to be taken;
- In exceptional circumstances the Careers Lead may refuse a work placement, in this situation a suitable alternative placement will be sought.

3.32 Personal Protective Equipment

Personal Protective Equipment (PPE) is provided for staff and learners, as the lowest level of the hierarchy of control, where the risk of exposure cannot be adequately controlled by other measures.

Lead Facilitators are responsible for ensuring PPE is provided in accordance with the Personal Protective Equipment Regulations 1992. The PPE must provide the level of protection required and must fit correctly; staff and learners must be trained in the appropriate use of the PPE and know how to clean and maintain it as necessary. A risk assessment should be written to determine the level of PPE required and ensure, if possible, other more effective control measures have been implemented.

3.33 Noise

The Control of Noise at Work Regulations 2005 (the Noise Regulations) aim to ensure that workers' hearing is protected from excessive noise at their place of work, which could cause them to lose their hearing and/or to suffer from tinnitus (permanent ringing in the ears).

The level at which employers must provide hearing protection and hearing protection zones is now 85 decibels (daily or weekly average exposure) and the level at which employers must assess the risk to workers' health and provide them with information and training is now 80 decibels. There is also an exposure limit value of 87 decibels, taking account of any reduction in exposure provided by hearing protection, above which workers must not be exposed.

If any member of staff is concerned about the noise levels in their working environment they should contact the Health and Safety Manager who will arrange for a noise level assessment to be carried out if appropriate.

3.34 Asbestos

The College complies with the Control of Asbestos Regulations 2006 and the Governors hold an asbestos certificate for each premises.

Prior to any building or maintenance work being undertaken on the premises by an approved member or approved contractor the asbestos register must be referred to. Under normal circumstances this is undertaken by the Site Manager.

3.35 Legionella

The College follows the approved code of practice and guidance as outlined in the HSE's document 'The Control of Legionella Bacteria in Water Systems'. The water systems are monitored by an external contractor on a regular basis; tests are undertaken and any remedial work is carried out.

3.36 Stress

The College recognises that anyone can be affected by work-related and personal stress and is conscious of the HSE's approach in tackling the effect stress can have on individuals and the organisation through the development of the Management Standards. The College takes a proactive approach to reducing stress levels with focus on the following key aims:

- To make sustainable improvements in the well-being of all staff working in the College;
- To promote supportive and well-informed managerial practice which actively develops a healthy workplace, focusing upon the progress of the organisation;
- To enable staff as individuals and in groups to manage successfully the pressures they face;
- To use a range of evaluation methods in order to identify strengths and weaknesses, to measure progress systematically, to inform action taken as a consequence, and to establish effective means of achieving success in different contexts, and
- To provide a means of networking information and research about best practice.
- The College Stress Management Policy sets out clear procedures to follow.

3.37 Alcohol and Drugs

The College endeavours to ensure that employees' and students' use of either alcohol or drugs does not impair the safe and efficient running of the organisation or the health of its employees and students.

Managers/facilitators who feel an employee's or student's unsatisfactory performance may be drug or alcohol related should arrange to hold a meeting with the individual to determine if the person acknowledges they have a problem. The matter should then be referred to the Managing Director who can offer further advice and support.

If a quantity of suspected illegal drugs are found on any College premises the matter must be referred to the appropriate Site Manager immediately, or in their absence the Lead Facilitator. The Police should then be notified via the 999 system.

The College will not tolerate the presence of any person on its premises who is under the influence of alcohol and/or drugs. The College Drug, Alcohol and Smoking Policy should be adhered to at all times.

3.37 Medicines

Prescribed medicines should only be self-administered on College premises by the individual concerned in accordance with the directions given by the medical practitioner who issued the prescription.

In exceptional circumstances staff may administer prescribed drugs to staff/students for emergency treatment; currently this relates to:

- EPI PEN containing adrenaline for reversing the effects of anaphylaxis, and
- BUCCAL Diazepam for reversing the effects of status epilepticus.

Any member of staff undertaking one of the above procedures must be trained in the procedure through training sessions arranged by the College. In addition, consent must be obtained in advance from the individual concerned or if under the age of 18 from their parent or guardian.

COVID

To ensure that the possible future risks of COVID presented to staff, students and visitors are reduced to an acceptable level the college will apply and communicate sensible risk management and safe working practices. This will involve:

- Regular assessment of hazards and associated risks
- Implementing preventive and protective control measures against those risks to an acceptable/ tolerable level
- Monitoring the effectiveness of those measures by senior managers
- Provision of information, instruction, training and protective equipment to staff (and students where required)
- Review of risk assessments, policies, procedures and practices at regular interval and where additional information is gained through either changes in government guidance, monitoring or following an incident.

- Implement measures to ensure social distancing is observed when required by government guidance across all sites and in all buildings consistent with and appropriate to the numbers of students, staff and visitors in the college.
- Maintain an appropriate hygiene regime to be followed by all students, staff and visitors
- Operate an enhanced cleaning regime for the duration of COVID
- Ensure that staff are informed and instructed to ensure competence and awareness of health & safety precautions required during COVID
- Educate students about COVID and to encourage and reassure them about the measures in place to protect themselves from it.
- Encourage all staff and students to show concern for their own safety and for that of the people around them.
- Require staff to exercise increased due care and attention and observe safe working methods.
- Communicate regularly and effectively with staff and students about the colleges response to COVID
- Put in place the support required for students with special educational needs and disabilities (SEND) in line with education health care (EHC) plans in conjunction with families and other agencies
- Put in place any flexible working arrangements needed to support delivery of education during COVID including where necessary staggered start/end times
- Put in place measures to check on staff wellbeing (including for students).
- Draw up contingency plans for:
 - Someone falling ill or demonstrating symptoms on site
 - Deep cleaning in the event of an outbreak of COVID on site
 - Provide appropriate personal protective equipment (PPE) as required by staff.
- Ensure that the college COVID Folder is constantly under review and updated for staff to access the latest information.

An in-depth procedure is contained within the college's Business Continuity Plan.

3.38 Support Animals on-site

The college recognises the important role support animals play in assisting staff and students in their day-to-day life including feeling safe and secure whilst in college. Any member of staff or student who wishes to bring a support animal onto site must provide evidence from a medical professional that the animal is required. Further evidence must also be provided that the animal has been trained to a recognised standard by a certified trainer and passed any supporting assessments.

A risk assessment should also be undertaken upon receipt of this documentation, before the agreement that the animal may be regularly allowed on-site, taking into consideration its whereabouts in the building and effects on other students and staff. Only on successful completion of the risk assessment may it be agreed that the support animal be allowed in the building.

Policies referenced in this policy:

- Alcohol and Substance Misuse Policy
- Fire Safety and Evacuation Policy