

Health and Safety at Work etc. Act 1974
Management of Health and Safety at Work Regulations 1999

Health and Safety Policy

January 2011

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Intended readership

This document is of interest to:

- All employees of ITS Limited
- Learners
- Employers engaged in work-based learning in partnership with ITS Ltd
- Other stakeholders such as funding bodies, Awarding Bodies, Ofsted and Area Federations/Partnerships

USEFUL DEFINITION

A child is legally defined as 'any person who is under the age of 18 years'. Further education providers are required to safeguard and promote the welfare of children. The broad definition of a vulnerable adult is 'a person who is 18 years of age or over, and who is or may be in need of community care services by reason of mental or other disability, age or illness and who is or may be unable to take care of him/herself, or unable to protect him/herself against significant harm or serious exploitation'.

The main categories of people covered by this definition of vulnerable adult include people:

- who have a learning disability
- who have physical or sensory impairments
- who have a mental illness including dementia
- who are old and frail
- detained in custody or under a probation order
- who are considered vulnerable and who may experience abuse due to problems with alcohol or drugs (or be vulnerable due to other circumstances such as being an asylum seeker).

INTER TRAINING SERVICES LIMITED: HEALTH AND SAFETY POLICY

For ease of reference, the main revisions made to this document as a result of the systematic annual review are identified in blue type.

Please note that Safeguarding is now covered in a SEPARATE policy.

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Section 1: General Statement of Policy

- 1.1 Health and safety is a fundamental value for Inter Training Services Limited (ITS Ltd) and is a standard agenda item for discussion at Board level. We believe that employees and learners are entitled to participate in activities that take place in a safe, healthy and supportive environment. We are committed to fulfilling our obligations of law for health and safety at work. We are also committed to meeting the requirements of the bodies and organisations that fund us and will take all reasonable steps to achieve this. This policy sets out how health and safety will be managed and its effectiveness measured. To ensure it remains current and valid, the policy is reviewed annually.
- 1.2 The Managing Director, Lesley Ellis, accepts overall responsibility for health and safety within ITS Ltd. However, practical implementation of the policy requires the full co-operation of all ITS Ltd managers and employees. We also require commitment from the employers with whom we work, as all learning and assessment is carried out on their premises.
- 1.3 It is the policy of ITS Ltd to provide, so far as is reasonably practicable, safe and healthy working conditions, equipment and systems of work for all our employees and learners and to provide the information, training and supervision needed to achieve this. This has to be achieved through co-operation with the employers with whom we work.
- 1.4 ITS Ltd is committed to the avoidance, reduction and control of risks to safety and health. All employers where learning is delivered are expected to make a formal commitment to this policy and co-operate in carrying it out. Individuals must ensure that their work is carried out without risk to themselves or others, so far as is reasonably practicable.
- 1.5 Most of the programmes involve working with young people and those under the age of 18. We understand that we owe them a higher level duty of care than is generally the case in an employer/employee relationship.
- 1.6 The allocation of responsibilities for safety matters, together with a summary of the arrangements to implement the policy are set out in sections 2 and 3 of this document.



Lesley Ellis - Managing Director
Date: 21st January 2011

Section 2: Organisation and Responsibilities

2.1 Managing Director

- 2.1.1 The responsibilities of the Managing Director (MD), working in conjunction with the Health and Safety Consultant, include the maintenance of safety records, investigation of accidents, providing accident statistics and keeping up to date with developments in health and safety legislation.
- 2.1.2 A full investigation of accidents will be carried out by the MD or her nominee with a view to the prevention of future occurrences.
- 2.1.3 The MD will ensure that new employees are given induction training, including the precautions and procedures appropriate to their specific jobs such as advice on driving and parking safely, business use car insurance, the transportation and carrying of items, lone working and the use of mobile phones and laptops.
- 2.1.4 She will ensure that all new employees are shown the location of first aid boxes, fire exits and fire fighting equipment and undertake a display screen equipment assessment.
- 2.1.5 She will ensure that all employees are made aware of all health and safety procedures and the company's health and safety [and safeguarding](#) policies.
- 2.1.6 She will arrange for any temporary employee, before commencing work, to be given information about any special occupational qualifications or skills required in order that the work can be carried out safely.
- 2.1.7 She will ensure that good house keeping standards are applied on the premises of ITS Ltd and that all work equipment is periodically checked for mechanical and operational safety.
- 2.1.8 She will ensure that the health, safety and welfare of learners remain a top priority at all times.

2.2 Access to Competent Health and Safety Assistance

- 2.2.1 ITS Ltd recognises its obligations under the *Management of Health and Safety at Work Regulations 1999* to have access to competent assistance in devising and applying the measures necessary to comply with health and safety legislation. This requirement is met, firstly, through the retention of Mark Dennis, Dip2OSH, CMIOSH, MRSH, MCIT, who is a Chartered Safety and Health Practitioner, to provide a health and safety consultancy service to support the Managing Director. The purpose of this appointment is to ensure that ITS Ltd strengthens its management of health and safety and has access to a high level of health and safety expertise.
- 2.2.2 The Consultant will assist with provision of health and safety information, carrying out periodic audits and monitoring of safety performance, investigating serious accidents and any other matters that may arise.
- 2.2.3 In order to equip them with a basic knowledge of health and safety, all staff complete the Level 2 Award in Health and Safety in the Workplace course. This is an assessed course, awarded by the Chartered Institute of Environmental Health (CIEH).

2.2.4 Initial health and safety assessments are carried out of all potential new employers by the [General Manager](#) or his nominee. To further strengthen and develop health and safety skills and competence, the person conducting the health and safety visits is accompanied by the Health and Safety Consultant on a sample of employer visits. This provides feedback on performance and identifies any further development needs.

2.3 Responsibilities of all ITS Ltd Employees

2.3.1 All employees have a responsibility to do everything they can to prevent injury to themselves, their colleagues and others who may be affected by their actions or omissions in the course of their work. They are expected to follow company procedures and in particular report any accidents which have resulted in injury or damage. Employees should also report 'near misses' and any potential hazards that are noticed.

2.3.2 Equipment provided must only be used in accordance with the training that has been received. Employees must inform their manager about any serious or imminent danger and report any shortcomings with protection arrangements. If a manager is not available, the employee may stop work and immediately proceed to a place of safety, in the event of being exposed to serious or imminent and unavoidable danger.

2.3.3 For safety reasons, any employee working alone on ITS Ltd office premises must lock themselves in and ensure somebody knows where they are and the time they are expected to finish. A means of escape in case of fire must, however, be easily available at all times.

2.3.4 All lone workers should follow the guidance for lone working that is available through training sessions or as part of their induction.

2.3.5 All employees must undertake a safe driver assessment and submit the required documents on request e.g. driving licence, MOT certificate, insurance details.

2.3.6 All employees are required to undergo a CRB Disclosure check (Enhanced) as a condition of employment of working with children/vulnerable adults.

2.4 Specific Responsibilities of Practitioners

2.4.1 Practitioners visiting employers' premises (e.g. Trainer/Assessors, Internal Verifiers and Support Mentors) have particular responsibility to act as role models and to promote responsible attitudes towards health and safety to both learners and employers.

2.4.2 All tasks carried out in the presence of learners and/or employers must be performed with the utmost regard for health and safety for all those involved. This includes adhering to the correct procedures for the disposal of sharps, dealing with blood spillages and carrying out skin tests.

2.4.3 Accidents must be reported immediately to the ITS Ltd office.

2.4.4 Learners under the age of 18, and vulnerable adults, are considered to need more careful monitoring than older learners because they may not recognise workplace risks and potential

hazards (please see the definition on page 2). All learners under the age of 18 or adults, who are considered to be vulnerable, must therefore be the subject of a risk assessment at the start of their training. If they change placement, another workplace induction must be repeated within four weeks of the new workplace start date. (See also section 2.5 below)

2.4.5 In addition, Practitioners are specifically responsible for the following:

- (a) Supplying sufficient information, instructions, training and supervision to enable learners to recognise and avoid hazards and contribute positively to their own health, safety and welfare at work.
- (b) Ensuring all learners complete the Health and Safety Task within the first four weeks of training.
- (c) Delivering the Health and Safety Unit FIRST to ensure learners have a good understanding of safe working practices and do not put themselves or others in danger during their first few weeks of training.
- (d) Taking notice of the health and safety arrangements of employers' premises and alerting the ITS Ltd office should anything give cause for concern.
- (e) Checking that the statutory Certificate of Employers' Liability Insurance is displayed and is in date.
- (f) Recording the number of accidents that have happened on an employer's premises at the time of carrying out Progress Reviews and completing an Accident Report Form if any accident relates to a learner. There is a Cut Finger Log available for partner salons to use for recording minor cuts. Checking this log helps Practitioners (and employers) identify learners who may benefit from additional training and practise in handling scissors and other cutting tools.
- (g) Regularly monitoring health conditions affecting learners such as sore hands, backache, migraine etc. is very important. Regular monitoring particularly applies to dermatitis which is a reportable condition under RIDDOR¹. Once a learner has been diagnosed with dermatitis by their GP, the employer is legally obliged to report it. This can be done online at <http://www.hse.gov.uk/riddor/online.htm>
- (h) Completing an annual health and safety review with each learner to monitor the retention and application of essential health, safety and welfare information needed for working safely.
- (i) Completing an annual health and safety review with each partner salon and reporting the findings to the office.
- (j) Declining to offer any form of medication to learners.
- (k) Advising the office should a learner's health condition change.

¹ RIDDOR is the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995
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PLEASE NOTE

Questions about a learner's general health, medication, allergies and learning difficulties are asked at recruitment. Learners have a right not to disclose such information, or not to have the information shared with others, *unless this is necessary to safeguard their health and safety*.

2.5 Additional responsibilities towards learners under 18 years and adults who are considered to be vulnerable (please see the definition on page 2)

2.5.1 In addition to the responsibilities detailed earlier in Section 2, where a learner is under 18 or is an adult considered to be vulnerable, the following matters should be agreed between the placement employer, the parent/guardian, the school/college (or appropriate organisation) and ITS Ltd:

- (a) **Travel safety** – does the journey to the salon for work experience put the learner at a greater risk than their normal journey to school/college? If so, how will this be managed?
- (b) **Parent/guardian wishes** – are there any particular wishes that need to be considered such as the learner leaving the salon on time at the end of the day, the likelihood of unsuitable adult role models having contact with their son/daughter, not having colour on their hair, a ban on smoking etc?
- (c) **Lunchtime arrangements** – is it safe for the learner to go out at break times unaccompanied?
- (d) **Supervision levels** – taking into account the potential immaturity and needs of those under 18 (and vulnerable adults) will they be adequately supervised at all times?
- (e) **Criminal Records Bureau Disclosures (Enhanced)** – at least one senior member of staff at the placement must undergo a check.
- (f) **Being alone with learners** – employees are advised not to travel alone in a car with a learner and be mindful of situations and discussions that could cause a learner to feel vulnerable or uncomfortable.
- (g) **Bullying** – all reasonable steps should be taken to ensure that learners are not subject to bullying, including racist, sexist and homophobic bullying.
- (h) **Reasonable care** – are all reasonable steps being taken to reduce or eliminate any risk to a young person or vulnerable adult?

2.5.2 To ensure this category of learner receives information that will protect them. A hand-out called 'A Guide to Staying Safe in a Hairdressing Salon' is issued at the time of the learner's engagement to those under the age of 18 years and adults considered to be vulnerable.

Section 3: Health and Safety Arrangements

3.1 Planning and Implementing

- 3.1.1 A rigorous system is in place to assess, monitor and review the health and safety arrangements of the partner salons in which learning takes place. All potential new employers complete a Work Environment Assessment. This includes, among other matters, a section on Health and Safety Standards and is effectively, a self-assessment of employers' health and safety arrangements.
- 3.1.2 The self-assessment is followed up by a visit to the potential employer by the General Manager or his nominee. During this visit, the assurances given at the self-assessment stage are verified to ensure they are current and valid. (See also Section 3.5)
- 3.1.3 Where deficiencies are identified at the employer engagement stage, these are formally notified to the employer by means of a letter or email. The letter/email sets a timescale for achieving the necessary improvements and compliance is subsequently checked by an ITS Ltd representative.
- 3.1.4 If an employer does not fully meet the Health and Safety Standards, it may be possible for learning to commence, on the basis that the required improvements will be made. This will depend on the extent of the risks to the learner's health and safety that the deficiencies present. Advice will be taken from the Health and Safety Consultant in such circumstances.

3.2 Performance Measurement

- 3.1 Good arrangements are in place for measuring health and safety performance. A sample of learners' and employers' records is checked every month. The audit results are used to identify any weaknesses, non-compliance and areas for improvement.
- 3.2 Confirmation is obtained that Employers' Liability Insurance is in place. Only a limited period of one month is allowed for evidence of renewal to be provided. This is necessary because the consequences for ITS Ltd of a learner working at a salon where this insurance is not in place could be very significant should a serious accident occur and compensation is payable.

3.3 Review and Audit

- 3.3.1 As noted above (paragraph 3.2), good arrangements are in place to monitor health and safety performance and the results of this monitoring are regularly reviewed.
- 3.3.2 An external audit is carried out annually by the Health and Safety Consultant, normally between November and January. He examines our procedures and arrangements from the point of view of a health and safety professional. A report is submitted to the Managing Director, with recommendations for strengthening the health and safety performance of ITS Ltd.

3.4 Provision of Safe and Healthy Learning and Work Environments

- 3.4.1 ITS Ltd is fully committed to providing learning and work environments that meet the health and safety standards of funding bodies and stakeholders. The Work Environment Report, used to evaluate employers' health and safety arrangements, is currently aligned with the [Skills Funding Agency blueprint for the concept of 'the safe learner'](#).
- 3.4.2 A health and safety review is carried out on every learning environment, before learners are engaged. (See also Section 3.1) An annual health and safety check is subsequently carried out on every work placement, for as long as they continue to work in partnership with ITS Ltd.
- 3.4.3 Every three years, the Work Environment Report is completed for each partner salon with which ITS Ltd continues to work.
- 3.4.4 Should the Work Environment Report or an annual review identify deficiencies, these are formally notified to the employer in writing. The letter or email sets a timescale for achieving the necessary improvements and compliance is subsequently checked to verify the required improvements have been made.

Section 4: Operational and Practical Arrangements

4.1 Introduction

- 4.1.1 This section of the health and safety policy sets out details of the practical arrangements that are in place to ensure the health and safety of ITS Ltd employees.
- 4.1.2 With regard to the office premises at Horndean, particular attention is paid to the following:
- (a) Maintaining fittings, equipment and systems of work
 - (b) Eliminating risks to health in connection with the use, handling, storage and transport of articles and substances
 - (c) Providing information, instruction, training and supervision to ensure the health and safety at work of employees and others
 - (d) Ensuring there is a safe means of access to, and egress from, the office premises
 - (e) Maintaining an environment that provides adequate facilities and arrangements for welfare at work
 - (f) Keeping the internal office entrance door locked
 - (g) Providing adequate levels of security that includes the requirement for all visitors to sign in and out of the premises, and for unknown visitors to produce a form of ID

4.1.3 The statutory risk assessments that are carried out to promote safe working include Display Screen Equipment, lifting and carrying, premises checks, visual checking of electrical appliance and installations, work practices, driving and lone working.

4.2 Accident Management

4.2.1 In the event of an accident causing injury, the first priority is to ensure that the injured person is being cared for and send immediately for a manager/First Aider. The injured person should not be moved. The name of the first aider is [displayed in the office](#).

4.2.2 During induction, employees are shown the location of the first aid box and Accident Book.

4.2.3 Full details of the accident should be reported to a manager, who will record the incident in the Accident Book. The accident will be reported to the enforcing authority (<http://www.hse.gov.uk/riddor/online.htm>) if necessary.

4.2.4 Any 'near miss' incidents that occur should also be reported to a manager. The manager is responsible for making a report to the Managing Director.

4.2.5 The Managing Director will investigate all incidents and near misses to ensure that necessary action is taken to prevent reoccurrence. She will seek advice and assistance from the Health and Safety Consultant as necessary.

4.3 Fire Safety

4.3.1 A fire drill will take place twice a year and the findings reported.

4.3.2 Fire exits, passageways and corridors must be kept clear from obstruction at all times.

4.3.3 All employees are told of their evacuation route and assembly point at induction.

4.3.4 Portable heaters should not be switched on when they are unattended.

4.3.5 Combustible materials are kept away from heat sources.

4.3.6 The server is adequately ventilated at all times to prevent over-heating.

4.3.6 The microwave and toaster should not be used unattended.

4.3.7 Cigarettes must be properly extinguished; a wall-mounted ashtray is sited on the external wall of the office.

4.4 Good Housekeeping

4.4.1 Desk and filing cabinet drawers must not be left open.

4.4.2 The lights in the stairwell must stay on during working hours.

- 4.4.3 All spillages must be cleaned up immediately.
- 4.4.4 Care should be taken when using the electric kettle in the upstairs office as it is near to a water supply.
- 4.4.5 Cups should be returned to the kitchen area, washed in hot soapy water (rubber gloves are available) and put away after use. Drinking glasses should not be left in the washing up bowl.
- 4.4.5 No attempt should be made to make any repairs, modifications or alterations to any equipment or plant, without the appropriate authority, skills and knowledge.
- 4.4.6 The cover on the photocopier must be closed during operation to prevent glare.
- 4.4.7 If using electrical display equipment, a break from that work should be taken for at least five minutes every hour and 15 minutes every four hours.
- 4.4.8 The end of day routine is:
- All computers/printers, lights, photocopier etc. are switched off
 - Windows, blinds and doors are closed
 - Domestic waste bins are emptied
 - The main internal office door is locked
 - The alarm is activated
 - The front door is locked

NB The alarm system must be de-activated to permit access to the downstairs office.

- 4.4.10 The office is cleaned every weekend. Employees should ensure their desk/working space is clear at the end of the week to allow adequate access for the cleaners.

4.5 Electrical safety

- 4.5.1 Basic steps that should be taken to ensure electrical safety:

- Staff are instructed, and regularly reminded, that electrical equipment must be used away from water and only used with dry hands (please see paragraph 4.4.4)
- Staff report to a manager any defects or faults that they notice with electrical appliances, plugs or cables
- Everyone knows where the main switch is, so they can turn off the electricity in an emergency
- Electrical equipment is only purchased from a reliable source

- 4.5.2 Inspection and testing of appliances

Portable appliance testing generally involves an electrician using a test instrument and taking readings about the performance of each appliance. A visual inspection of the appliance is generally carried out at the same time. The equipment is then labelled or tagged to confirm it has been checked.

However, advice from the Health and Safety Executive (HSE) indicates that this procedure is not necessary for appliances that are double-insulated. This means that there are two layers of insulation between all live parts and the external surface. This type of equipment is normally referred to as Class II and labelled accordingly. Another indication that an appliance is double-insulated is two small squares, one inside the other, on the label or casing.

If the equipment is double-insulated, adequate safety can normally be ensured by a responsible person carrying out a series of visual checks. A visual check will not provide sufficient assurance of safety of electrical appliances that are not double-insulated. In this case, we have them inspected and tested by a qualified electrician every two years (PAT Testing).

4.5.3 The points to look for are any signs that the appliance may not be in a sound condition and include:

- Damage to the cable
- Damage to the plug (e.g. the casing is cracked or the pins are bent)
- Inadequate cable joints (taped joints in the cable are not acceptable)
- The outer covering of the cable is not effectively secured where it enters the plug or where it enters the appliance. (The coloured insulation of the internal cables should not be visible)
- Damage to the external casing of the appliance; or any loose parts or screws. Also check that the switch is not visibly damaged in any way
- Evidence of overheating, such as burn marks or discoloration

4.5.4 Checks are carried out approximately every six months. If any of the above signs are present, we either permanently dispose of the appliance or seek help from a qualified electrician to repair it.

4.5.5 Because we rely on visual checks to ensure the safety of our electrical appliances, it is essential that we keep adequate records of these checks. We identify each appliance by a label or tag. Then, we prepare an inspection record sheet, listing the points noted above, for each appliance. We allow enough space to include the date of each inspection and the name of the person carrying it out. For each appliance, we initial each point checked. The records are then signed and on completion. The record sheet is completed each time the appliance is checked (about every 6 months).

4.6 Working at Heights (reaching etc.)

4.6.1 Employees should not attempt to obtain items that are beyond reach. A ladder or step stool should be used to gain access, when this is necessary and a co-worker should assist you.

4.7 Lifting and Carrying

4.7.1 Crates to be lifted or carried should not be overloaded.

4.7.2 Only items that can be safely handled without causing personal injury should be lifted or carried.

4.7.3 Employees should ask for help if needed, especially if it is necessary to go up or down stairs.

4.7.4 When lifting, always bend at the knees and keep the back straight.

4.7.5 A wheeled case should always be used when transporting items to employers' premises. These are supplied free of charge for all employees who need them.



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