

1. STATEMENT OF INTENT

- 1.1 Indie Education, working in partnership with YMD Boon Ltd, will honour their legal obligations, in particular the requirements of the Health and Safety at Work etc. Act 1974, associated regulations and Approved Codes of Practice as well as other relevant legislation identified under section 5.
- 1.2 Indie Education recognises and accepts its responsibilities and duties to conduct its operations in a manner which protects the health, safety and wellbeing of employees, learners and visitors so far as is reasonably practicable.
- 1.3 In compliance with the Management of Health and Safety at Work Regulations, risk assessments will be undertaken, and arrangements will be made, where significant risks are identified, for any necessary preventative and protective measures to be put into place as far as is reasonably practicable using a sensible risk management approach.
- 1.4 To achieve these objectives Indie Education will:
- (a) Identify hazards and assess the risks associated with its employees, premises, operations, equipment and substances used during business and implement appropriate control measures
 - (b) Provide and maintain safe and healthy working conditions, and a safe working environment and welfare facilities.
 - (c) Ensure employees are competent and provide adequate information, instruction, training, and supervision to enable employees to perform their work safely.
 - (d) Maintain communication and consultation with employees on health and safety matters.
 - (e) To prevent accidents and cases of work-related ill health.
 - (f) Promote the principles of sensible risk management.
 - (g) Monitor, review and modify this policy and any arrangements as required via a process of periodic management system audits and inspections.
- 1.5 All of Indie Education staff members have a duty to take reasonable care of themselves and others and to co-operate to ensure statutory duties and obligations are fulfilled.

2. SCOPE

- 2.1 This Policy applies to all Indie Education (**Indie**) employees (including full time, part time, permanent, fixed term and casual), contractors, volunteers, members of the governing Board of Trustees, and any other associated persons or entities.

3. ROLES AND RESPONSIBILITIES

3.1 The CEO

- 3.1.1 The CEO, Chris Bruce, has overall responsibility as the employer to ensure compliance with health

and safety legislation is maintained for Indie Education. To meet this duty, the CEO will:

- (a) Ensure throughout Indie Education that adequate resources are available to comply with commitments and aims made in Indie Education health and safety policy.
- (b) Take the lead in communication of health and safety duties and benefits throughout Indie Education.
- (c) Ensure the development of a positive safety culture through commitment and visible support.
- (d) Ensure that there is a periodic review of Indie Education's health and safety performance.
- (e) Ensure that corporate governance and risk management procedures take account of health and safety
- (f) Take a positive interest in health and safety progress of Indie Education
- (g) Provide access to competent health and safety advice through YMD Boon Ltd Health & Safety Service.
- (h) Being the primary contact between Indie Education and YMD Boon Ltd. Health and Safety Service.
- (i) Ensuring the health and safety policy and related procedures are implemented throughout Indie Education.
- (j) Ensuring any reportable incidents required under RIDDOR are reported to the Health and Safety Executive in a timely manner and incident reporting procedures are followed including trend monitoring and sharing of findings from investigations.
- (k) Plan and arrange health and safety monitoring as detailed in the Indie Education health and safety policy.
- (l) Ensuring procedures are in place for the selection and monitoring of contractors and they meet the standards and requirements set out in the Indie Education health and safety policy, relevant legislation and industry best practice.
- (m) Ensuring that individual sites within Indie Education have access to competent health and safety advice.

3.1.2 The CEO may delegate responsibilities identified in this policy to others throughout the organisation, however, retains the overall accountability and responsibility.

3.2 Site Leaders

3.2.1 Site Leaders will be responsible for the day-to-day management of safety and implementation of this policy within the site. They will achieve this by:

- (a) Working with CEO and DCEO to ensure aims of the Indie Education health and safety policy are completed, safe working practices and procedures are implemented, and a safe working environment is provided to staff, learners, visitors and contractors
- (b) Ensuring risk assessments are in place and reviewed annually

- (c) Allocating adequate resources within the site to allow staff to complete health and safety training required to be competent to complete their role.
- (d) Ensuring any health and safety monitoring (via auditing and inspection processes detailed in health and safety policy) and reporting is undertaken as detailed in the Indie Education health and safety policy.
- (e) Ensuring equipment and plant on site is serviced and maintained as required/directed by competent persons, legislation or industry best practice.
- (f) Ensuring in-house compliance checks are undertaken and documented as required.
- (g) Ensuring procedures relating to hazardous substances are in place and being followed by staff
- (h) Effectively communicating health and safety matters within their sites
- (i) Report to CEO any health and safety issues that cannot be resolved
- (j) Responsible for implementing the Indie Education health and safety policy in their areas of responsibility and control.
- (k) This includes:
 - i. Ensuring Indie Education health and safety standards set out in this health and safety policy are implemented.
 - ii. Consulting with colleagues on health and safety matters effecting their health, safety and wellbeing.
 - iii. Completion of, review and sharing of findings for risk assessments relevant to their role and areas of responsibility.
 - iv. Completing of investigation where appropriate and reporting to relevant persons and bodies.
 - v. Ensuring duties and responsibilities delegated to staff members are completed
 - vi. Ensuring adequate resource is available to their staff to comply with duties expected of them.
- (l) Ensure that regular proactive daily/ weekly/ monthly Health and Safety inspection/checks are undertaken to ensure the safety of staff, learners, and visitors.
- (m) General responsibility for the application of the site's health and safety policy to their own area of work and are directly responsible to the CEO.
- (n) To establish and maintain safe working procedures including arrangements for ensuring so far as is reasonably practicable, the absence of risks to health and safety in connection with the use, handling, storage and transport of articles and substances (e.g. chemicals, boiling water and sharp instruments).
- (o) To carry out regular health and safety assessments of the activities for which they are responsible, and report to the CEO any defects, which need attention.

- (p) To ensure, as far as is reasonably practicable, the provision of sufficient information, instruction, training, and supervision to enable other employees and learners to avoid hazards and contribute positively to their own health and safety, as part of Indie Education's health and safety training requirements.
- (q) To ensure where appropriate, relevant advice and guidance on health and safety matters is sought.

3.3 All Staff including Teachers, Instructors, and Learning Support Mentors

3.3.1 All staff, agency and peripatetic workers and contractors must comply with Indie Education's health and safety policy and associated arrangements, in addition to any specific responsibilities which may be delegated to them.

3.3.2 In particular they are required to:

- (a) Take reasonable care for their own health and safety at work and of those who may be affected by their actions or by their omissions.
- (b) Cooperate with their line manager and wider leadership team to work safely.
- (c) Comply with health and safety instructions/ information and undertake appropriate health and safety training as required.
- (d) Not intentionally or recklessly interfere with or misuse anything provided in the interests of health, safety, and wellbeing.
- (e) Report to CEO any health and safety concerns, hazardous condition or defect in the health and safety arrangements.
- (f) Support Indie Education in embedding a positive safety culture that extends to learners and any visitors to the site.

3.4 Competent Person - YMD Boon

3.4.1 Indie Education will ensure that it has access to competent technical advice on health and safety matters to assist in meeting its objectives. This will be achieved by accessing the services of a competent Health and Safety Advisor through YMD Boon Ltd, Health and Safety Service, 6b Anson House, Compass Point Business Park, Market Harborough, Leicestershire, LE16 9HW.

3.4.2 If CEO or site leaders require support for any health and safety matter, they will contact YMD Boon who will support and advise on matters and provide proactive support to ensure the safety of all users of the sites.

4. ARRANGEMENTS

4.1 Objective

4.1.1 Indie Education shall establish and maintain arrangements to ensure effective standards, procedures and control measures are in place as a result of risk assessment, company policy, legal requirements and occupational health and safety objectives in order to prevent injury or occupational ill health.

4.2 **Accident, Incident and Dangerous Occurrence - Investigation and Reporting**

4.2.1 Indie Education shall ensure that:

- (a) An established procedure is in place for the reporting of accidents, incidents, near misses, dangerous occurrence and cases of occupational ill-health.
- (b) The handling and investigation of accidents, incidents, near misses, dangerous occurrence and cases of occupational ill-health to prevent reoccurrence by establishing root cause.
- (c) Actions are taken to mitigate any consequences arising from accidents, incidents, near misses, dangerous occurrence and cases of occupational ill-health.
- (d) The initiation and completion of corrective and preventative actions.
- (e) Appropriate means are used to record the factual information and the results of the immediate investigation and the subsequent detailed investigation.

4.2.2 Reportable incidents, as per the HSE's Information Sheet edis1 (rev3), will be reported to the HSE within the required timescale as determined under the Reportable Injuries, Diseases and Dangerous Occurrences Regulations.

4.2.3 Accident, assaults and near miss incidents will be monitored at least termly as part of the Health & Safety Committee; identification of significant trends or major incidents will be reviewed by the executive leadership team.

4.2.4 Learner incident investigation forms are retained until the learner reaches the age of 21 years, employee forms for 3 years and forms relating to work related ill health for 3 years or longer, (40 years where there has been potential exposure to radiation or asbestos; further guidance is obtained from YMD Boon Ltd Health and Safety Service).

4.2.5 All premises related issues will be addressed in a timely manner.

4.3 **Asbestos**

4.3.1 Indie Education will ensure that it complies with the *HSE's approved code of practice L143 Managing and working with asbestos Control of Asbestos Regulations 2012*. The Indie Education is committed to preventing exposure to asbestos fibres to all persons that enter onto its premises and manages this by:

- (a) Ensuring that staff and contractors are to be made aware of locations of asbestos in areas that are relevant to their work.
- (b) Maintaining up to date information of all sites in relation to location and condition of asbestos via central Indie Education register and site specific local asbestos management plans.

4.4 **Communication and Consultation**

4.4.1 Indie Education will encourage active participation through consultation with all employees in line with The Health & Safety (Consultation with Employees) Regulations 1996 and will so far as is reasonably practicable:

- (a) Appoint competent persons to provide advice and to implement emergency procedures.
 - (b) Provide information on risks to health and safety and on preventive measures.
 - (c) Provide employees and associates with information and training before starting work or when new risks are identified.
 - (d) Provide information to employees to enable them to carry out their work safely.
- 4.4.2 Employees are expected to communicate effectively including reporting unsafe acts and conditions as well as defects and/or failures in the company's safety management as well as any accidents, injuries, dangerous occurrences or release of any dangerous substance.
- 4.4.3 Indie Education will make every effort to involve employees in decisions and development of good health and safety practices across the business and will reply to all genuine comments and enquiries or suggestions on improving safety.
- 4.5 **Construction (Design & Management) Regulations 2015 (CDM)**
- 4.5.1 Indie Education may from time-to-time commission construction work to premises under its control. In this event, Indie Education will obtain advice and will ensure, so far as is reasonably practicable, compliance with the Construction (Design & Management) Regulations 2015 and any other relevant Regulations. Indie Education would only have duties under CDM as a Client.
- 4.5.2 As a Client they are to:
- (a) Make suitable arrangements for managing a project. This includes making sure other duty holders are appointed and that sufficient time and resources are allocated.
 - (b) Make sure that all relevant information is prepared and provided to other duty holders, ensuring that the Principal Designer and Principal Contractor carry out their duties and that welfare facilities are provided.
- 4.6 **Control of documentation**
- 4.6.1 The goal of Indie Education is to have clear, concise and functional safety documentation that is effective to support the sites within the organisation. Documentation will be proportionate to the level of risk present. Safety documentation will be filed digitally where anyone who may need access has it. Documents will be password protected where required to prevent access to private information or to prevent documentation being changed by someone who is not authorised to do so.
- 4.6.2 Any records detailed in law (risk assessments, policies) will be documented and significant finding shared. Documentation relating to statutory checks will be held on site and those with legal duties aware of their location. These will be made easily accessible for anyone who would need them.
- 4.6.3 Documentation will be held for a minimum of three years.
- 4.7 **Control of Substances Hazardous to Health**
- 4.7.1 Hazardous substances will be assessed as required under COSHH regulations, with hazards from their use or storage identified, and controls required to make use of the substance safe also

documented. A copy of this information should be kept on file, employees made aware of the risks and precautions to be taken, and the assessment reviewed regularly and where there are significant changes. Management should ensure that advice is followed, and control measures detailed in the assessment are complied with.

4.7.2 Hazardous substances include (as per HSE guidance):

- (a) chemicals
- (b) products containing chemicals
- (c) fumes
- (d) dusts
- (e) vapours
- (f) mists
- (g) nanotechnology
- (h) gases and asphyxiating gases
- (i) biological agents (germs). If the packaging has any of the hazard symbols, then it is classed as a hazardous substance.
- (j) germs that cause diseases such as leptospirosis or legionnaires disease and germs used in laboratories.

4.7.3 All substances must be stored in suitably marked containers, clearly identifying the contents. Care should be taken to store incompatible substances away from each other.

4.7.4 The location of any hazardous items should be included in the information pack for the emergency services so that in the event of an emergency they can determine the nature amount and location of hazardous (especially flammable) substances.

4.7.5 Where appropriate, health surveillance must be provided where employees exposed to hazardous substances following a risk assessment, shall be completed. Exposure levels of people to hazardous substances shall be monitored to ensure adequate control measures in place. Where appropriate, a competent person e.g. Occupational Hygienist shall be appointed to measure exposure.

4.7.6 Risk assessment will be documented and reviewed at least every two years for significant and high risk; and every five years for medium to low risk; or where there is significant change.

4.8 **Display Screen Equipment**

4.8.1 Indie Education acknowledges that employees that 'habitually' use DSE should have suitable equipment to undertake the tasks that they are required to carry out, know how to use the software applicable to their role and complete a DSE self-assessment and will ensure that:

- (a) All static workstations used by staff meet the minimum standards required.
- (b) Equipment is maintained in good working condition.

- (c) Staff are aware of best practice in using DSE and issued with relevant information.
- (d) Staff whose roles require significant use of DSE complete a self-assessment which is reviewed at suitable intervals by a competent person.
- (e) Assessments are reviewed if there are significant changes to equipment/layout or individual health.
- (f) DSE users are made aware that an appropriate eye and vision test is available to them on request.

4.9 Driving for Work

- 4.9.1 All staff that drive their own cars for work purposes must have a full UK driving licence, business insurance and maintain their vehicle in a road worthy condition in line DVLA requirements. Annual licence, insurance and where applicable MOT checks are undertaken and documented by the CEO.
- 4.9.2 Under no circumstances must mobile telephones be used whilst driving. When on a public highway, drivers/operators must adhere to statutory driving regulations and the Road Traffic Acts.
- 4.9.3 Where staff are required to drive a minibus as part of their duties Indie Education will ensure they hold the correct classification on their driving license, meet specific driving criteria, and will be provided with formal driver training.
- 4.9.4 For staff that transport learners either in Indie Education or their own transport, licence checks will be completed annually.
- 4.9.5 Risk assessments will be documented for all situations where learners are transported off site either as part of the off-site visit or separately as necessary.

4.10 Electrical Installations and Equipment

- 4.10.1 Indie Education have a duty to protect our employees and other people who use our premises from the risk of electrical injury caused by our electrical installations, our use of fixed equipment and our use of portable electrical appliances. This will be achieved by maintaining and servicing electrical systems and equipment in line with statutory guidance and best practice. Electrical installations are periodically inspected every 5 years by a competent contractor which is managed by the building owners and records are maintained; any remedial works recommended are acted upon in a timely manner (if this is undertaken in stages over that period insert arrangements). Where this is the responsibility of Indie Education it will be obtained throughout a suitable contractor. Where it remains the responsibility of the landlords, Indie Education will ask for evidence this has been completed.
- 4.10.2 Portable electric appliances have a portable appliance test (PAT) carried out, in line with *HSE guidance 'Maintaining portable electrical equipment in offices and other low environments' (INDG236)*, by a competent person with records maintained.
- 4.10.3 Staff are instructed to undertake a visual inspection of equipment prior to use and not to use any equipment that appears damaged or defective with Indie Education's defect reporting procedure

followed as required.

4.10.4 Staff are not permitted to bring in any electrical items from home without written consent from the CEO.

4.10.5 Anybody working with electricity must be competent, which means the correct knowledge, training and experience to prevent any danger or injury to either themselves or others.

4.11 **Fire Safety**

4.11.1 Indie Education will aim to eliminate the risks from fire, so far as is reasonably practicable. Where fire risks cannot be eliminated, measures will be taken to reduce the risk to the lowest practicable level. In achieving this goal, all sources of fuel, ignition and any other factors that are under Indie Education's control will be considered. A fire risk assessment will be conducted in accordance with current legislation by the building owner.

4.11.2 The fire risk assessment will be reviewed annually, or more frequently where considered necessary. The fire risk assessment will be reviewed after any incident that has caused or could have caused a fire of any significant failure in the fire detection, control or evacuation procedures.

(a) Information, training and instructions will be provided to all staff with particular regard to those individuals who are nominated as having specific duties.

(b) A fire drill will be conducted at least termly, the interval or number of drills may vary if it is considered that there is a need to provide additional training or high student mobility.

(c) Emergency evacuation routes will be clearly marked and lit.

(d) A record of persons will be maintained on the premises and on evacuation all persons will be accounted for.

(e) Maintenance and testing of fire safety equipment, plant and installations will be completed by a competent person in line with industry best practice and documented.

4.12 **First Aid**

4.12.1 Indie Education will conduct a risk assessment covering the number and type of First Aiders required, and the location of First Aiders and first aid equipment. The first aid provisions will be of the appropriate number, based on the risk level, number of employees and layout of the premises. Provisions for first aid will be reviewed on a regular basis and kits re-stocked as required.

4.12.2 Indie Education will ensure that where first aid training is given it is by persons qualified to do so. First Aid qualifications should be renewed every 3 years. At induction, employees will be given information and clear directions as to the location of first aid equipment, first aid room and the names and means of contacting first aid trained employees. Only trained employees will be considered First Aiders for planning and organising purposes.

4.13 **Food Safety and Catering**

4.13.1 Indie Education recognise the importance of maintaining a high standard of Food Safety and

Hygiene within the kitchens, along with the provision of nutritious food for learners. Indie Educations manage this by ensuring:

- (a) All staff employed by Indie Education who work in the any kitchens on sites must have attended a Level 2 Award in Food Safety in Catering. The qualification should be renewed every 3 years
- (b) Catering equipment is regularly maintained and inspected, and ventilation systems are inspected every 14 months and subject to a regular cleaning regime.
- (c) A Hazard Analysis Critical Control Points (HACPP) management system as identified in the Food safety and hygiene (England) Regulations 2013 is in place and documented.
- (d) The Food Standards Agency safer food better business guidance is followed.

4.14 Gas/Oil

4.14.1 Installations, maintenance and repair of gas/oil appliances, pipes, meters, flues and other fixtures and fittings will only be completed by Competent Engineers. Regular maintenance and servicing will be completed on the system by an external Competent Engineer. A “Competent Engineer” must be on Gas Safe Register and be qualified to do the works required.

4.14.2 Emergency procedure for gas leak will be included in site emergency manual.

4.15 Glazing

4.15.1 In relation to glazing within its premises, Indie Education will ensure that it complies with the Workplace (Health, Safety and Wellbeing) Regulations 1992 in existing buildings and the Building Regulations 2000 (as amended) which covers new buildings. All identified critical glazing will conform with EN12600.

4.15.2 Indie Education will manage the risks associated with glazing safety by ensuring that:

- (a) An up-to-date glazing audit and risk assessment conducted by a competent person has been completed.
- (b) Any remedial actions identified are actioned as appropriate.
- (c) Any broken glazing is made safe and repaired.

4.16 Hazard Identification & Risk Assessment

4.16.1 Indie Education shall establish and maintain procedures for the ongoing identification of hazards, the assessment of risk and the implementation of necessary control measures. A suitable methodology shall be identified and implemented to ensure that suitable and sufficient risk assessments are undertaken for tasks/ activities/ substances where significant hazards have been identified or where there is a foreseeable risk of injury/ill health.

4.16.2 Appropriate staff are involved in the development of risk assessments prior to consultation with all staff to which they are relevant prior to sign off. Risk assessments are communicated to relevant staff and are accessible to staff at all times.

4.16.3 Information, instruction and training shall be provided to those authorised to conduct risk

assessments and where it is deemed necessary, by risk, the site shall appoint a third-party competent person to conduct such risk assessments

- 4.16.4 Risk assessments shall be documented and reviewed at least every two years. Other technical risk assessments (e.g. Legionella, Fire, DSEAR) shall be reviewed based on the assessment findings and advice from competent appointed person. Risk Assessments must be reviewed when significant changes occur, following accidents, incidents or serious near misses.

4.17 **Health and Safety Management System**

- 4.17.1 We recognise the business benefits that can accrue from the effective management of safety and health at work. To obtain these benefits for Indie Education, we have recognised the need for an effective management system and have taken steps to put such a system in place detailed within this policy.
- 4.17.2 Those with responsibilities for implementing this safety management system are also detailed above.

4.18 **Health Surveillance**

- 4.18.1 Health surveillance aims to put in place appropriate processes to detect early signs of work-related ill health among staff exposed to specific health hazards and act upon any findings.
- 4.18.2 The site shall identify the need for health surveillance through the completion of risk assessment. Health Surveillance will be considered for tasks/areas where employees are at risk from (but not limited to):
- (a) Noise
 - (b) Vibration
 - (c) Hazardous substances
- 4.18.3 Health surveillance may involve a range of checks carried out by a range of people including:
- (a) The employee themselves
 - (b) A responsible person
 - (c) An Occupational Health Provider
 - (d) A Clinical Professional

4.19 **Hybrid Working**

- 4.19.1 Persons working from home are protected under health and safety legislation as if they were in Indie Education premises. As such, all health & safety policies & procedures apply. This included reporting work related near misses, incidents and accidents.
- 4.19.2 Employees working from home will be provided with information to make sure they can work safely. Managers will be responsible for keeping in touch with their teams and that they are working safely.
- 4.19.3 Employees will be responsible for their own safety while working from home and they are expected to raise any health and safety concerns with their Line Manager so they can be dealt

with.

- 4.19.4 Work equipment provided to employees to use while working from home must be kept in good condition and any faults or damage reported so repairs or replacements can be arranged. Those working from home are responsible for keeping the equipment in good condition and reporting any concerns.

4.20 **Housekeeping Standards**

- 4.20.1 One of the most practical and sensible ways to improve safety, and where everyone can play their part, is good housekeeping. Slips and trips are a common cause of injury in the workplace and to control this, everyone must contribute to ensuring the workplace is kept clear of obstructions and hazards where possible.
- 4.20.2 Good housekeeping is vital in all work areas and all employees are responsible for maintaining a clean and tidy workplace.

4.21 **Induction**

- 4.21.1 All new staff undergo a full programmed induction which covers all the basic and key Indie Education policies and procedures, including (but not limited to) safeguarding, health & safety and fire safety, which are found in the terms and conditions of employment. Employee inductions will be completed and stored by the site leaders.
- 4.21.2 A check sheet is signed by all staff to show that the employee has attended the induction and a signature is required against each document covered, this is counter-signed by the Trainer undertaking the induction.

4.22 **Isolation of Energy Sources**

- 4.22.1 A documented procedure must be implemented and active to fully isolate any equipment, both electrically and mechanically (pneumatic and hydraulic), inclusive of steam, water, gas etc, ensuring that the electrical circuit is 'dead' and any residual energy is dissipated, before any work is carried out near dangerous moving parts.
- 4.22.2 The isolation procedure must also apply when multiple people have to work on a system and must ensure safe hand over at shift changes. The isolation procedure must be capable of linking into the site permit to work system.
- 4.22.3 Emergency stop buttons shall be located near the hazard areas of equipment operation.
- 4.22.4 Where it is not possible to fully isolate using a local isolator (e.g. older style equipment), then a clear procedure for correct isolation and lock off shall be in place at the main power distribution panel(s).
- 4.22.5 No 'Live' work on electric's shall be permitted by Indie Education employees.
- 4.22.6 Appropriate warning signage shall be used when equipment is isolated.

4.23 **Legionella**

- 4.23.1 Indie Education will control, prevent and minimise the risk from legionella, to provide and

maintain safe and healthy working conditions, equipment and systems of work for all learners, colleagues, contractors and visitors, and to provide such resources, information, training and supervision as needed for this purpose. Indie Education will do all that is reasonably practicable to manage the risk of legionella.

4.23.2 There are several situations, work procedures and equipment that could give rise to the potential of legionella and other similar waterborne diseases. Indie Education have trained Employees to manage the legionella risk on site and use a competent third-party contractor to complete servicing, maintenance and testing of water systems where conditions can promote growth of Legionella.

4.23.3 Regular testing is completed on site to ensure systems are in good condition and growth promoting conditions are dealt with as soon as possible.

4.23.4 The site shall appoint a responsible person for the management of legionella (HSE Approved Code of Practice L8) who will be provided with suitable information, instruction and training to ensure that they are competent to manage the legal requirements.

4.24 **Lifting Operations and Lifting Equipment**

4.24.1 Lifting equipment should be of adequate strength for the purposes it will be used for and appropriate to lift loads expected of it.

4.24.2 Machinery, lifting equipment and accessories shall each be marked with their safe working load. Where applicable accessories shall be marked to identify specific lifting characteristics.

4.24.3 Any equipment used to lift people shall be designed to prevent crushing, trapping, being hit or falling from carrier.

4.24.4 Lifting equipment to carry people shall be marked to indicate both the safe number of people and the maximum safe load.

4.24.5 Lifting equipment shall be thoroughly examined and inspected after installation but before initial use.

4.24.6 Lifting equipment shall be thoroughly examined and inspected after re-assembly and installation at a new location.

4.24.7 Lifting equipment shall be thoroughly examined and inspected after any situation affecting safety.

4.24.8 Lifting Equipment used for lifting people; including lifts/elevators and associated lifting accessories used as part of the system, (for example hooks, eyebolts, shackles), shall be examined every 6 months.

4.24.9 Other lifting equipment shall be examined every 12 months or following an examination scheme determined by a competent person and a risk assessment.

4.24.10 A competent person shall undertake examinations; they shall also decide whether testing is necessary.

4.24.11 Examiners shall notify any defects verbally and in writing (within 28 days) to the site, to any

leasing company and to the local enforcing authority if there is a safety risk, there must be no further use of equipment until the fault is fixed.

4.25 Lighting

4.25.1 Natural lighting is the best form of light and should be provided in preference to artificial light. Lighting should be installed which not cast shadows or cause excessive glare. Care should be taken to avoid flickering or stroboscopic light, which can trigger epileptic fits.

4.25.2 Appropriate lighting should be provided in all areas including outside areas. Areas which need lighting include stairways and routes of exit in an emergency, which should have emergency (battery powered) lighting. Areas which are not lit by natural light will need lighting. Site will conduct a survey of the lux levels to identify any remedial works required.

4.26 Local Exhaust Ventilation

4.26.1 The site shall ensure that where employees are likely to be exposed to substances or agents that are a risk to their health, steps must be taken to reduce that exposure to as low a level as is reasonably practicable. Local Exhaust Ventilation (LEV) can help to reduce the level of exposure.

4.26.2 To achieve compliance, the site shall do the following:

- (a) Reviewing our arrangements and procedures for the management of hazardous substances and risk to identify where existing controls are not sufficient to protect workers or others from the risk of ill health
- (b) Identifying where LEV is required to reduce risk to an acceptable level or provide further protection
- (c) Assessing the suitability and adequacy of the LEV supplied for use
- (d) Explaining the need for and the correct use of LEV to the workforce
- (e) Making sure that Managers and Supervisors know why and when LEV is required
- (f) Providing facilities for the cleaning and maintenance of LEV

4.26.3 All identified LEV shall be subjected to a statutory inspection by a competent person in line with legal requirements.

4.27 Lone Working

4.27.1 Indie Education acknowledges that there will be times that some staff work either alone or in what is considered an isolated environment. To manage the risk to colleagues of working alone the following arrangements are in place:

4.27.2 Indie Education will ensure that:

- (a) The premises and grounds have robust security systems in place to prevent unauthorised persons from gaining access to the site or premises
- (b) Local arrangements are in place for staff who are working alone so that they have regular monitoring visit/communication dependent on the situation.
- (c) Staff advised to alert senior leadership team of any medical conditions that have the

potential to increase the risks of working alone.

- (d) Only tasks considered low risk will be undertaken when working alone.
- (e) If lone working is required off site e.g. Home Visits, specific risk assessments will be undertaken.

4.28 Management and Control of Contractors

4.28.1 Indie Education uses a number of Contractors for various tasks (including but not limited to maintenance and service, PE, coaches and transport). In order to ensure safe management of the risks associated with use of contractors, the Indie Education will:

- (a) Have contractors' complete pre-qualification questionnaires to ensure appropriate due diligence is completed on contractors to establish their competencies. This will include:
 - i. A Copy of the contractors Health and Safety Policy.
 - ii. Information concerning training of their operators or sub-contractors.
 - iii. Any information about enforcement action taken by regulatory authorities.
 - iv. Any information about enforcement action outstanding.
 - v. Any information about serious or fatal accidents experienced.
 - vi. Copies of their liability insurance policies (employee and public).
 - vii. Method statements for the tasks expected to be carried out, plus relevant risk assessments.
 - viii. A list of the people expected to be used during the contract.
- (b) Where the above information is not available, contractors will complete Declaration of Competency and agree to work within Indie Education.
- (c) Clear briefs will be provided to contractors ahead of works being completed
- (d) Where required, pre-start meetings will take place
- (e) Key contacts will be identified and shared with contractors
- (f) Appropriate supervision will be in place for contractors

4.28.2 Indie Education will:

- (a) Plan in contractors' work out of hours or during weekends/holidays.
- (b) Review the impact of contractors working on site and change processes where required.
- (c) Ensure any changes to day-to-day operation of the sites impacted by contractor work are shared with staff to maintain a safe environment for the duration of the works.
- (d) Hold a copy of relevant Risk Assessments and Method Statement to ensure works can be supervised and monitored by site staff
- (e) Supervise contractors when on site
- (f) Ensure works are visually monitored where required and any concerns immediately reported.
- (g) Ensure works are signed off and any associated certification and documentation is obtained.

4.29 **Manual Handling**

4.29.1 Within the college there are a variety of manual handling tasks that may be necessary; this could range from moving files to assisting an individual with mobility issues. The college manages the risk associated with moving and handling tasks by ensuring that:

- (a) Moving and handling is avoided whenever possible.
- (b) If it cannot be avoided, moving and handling is properly risk assessed and completed by competent staff and carried out in a manner which is, so far as is reasonably practicable, safe.
- (c) Those undertaking specific moving and handling tasks have received appropriate training and training records are maintained.
- (d) Any equipment provided to assist with moving and handling tasks is maintained and serviced in accordance with statutory requirements.
- (e) Any defective equipment is taken out of use until repaired or is replaced.
- (f) An individual risk assessment will be completed for staff with identified medical conditions that may be affected by undertaking moving and handling tasks, these may result in some moving and handling task being restricted.
- (g) Any accidents resulting from manual handling operations will be investigated to identify root causes and implement additional controls as required.

4.30 **Monitoring (Audits, Inspections and Checks)**

4.30.1 Audits and inspections are important parts of health and safety arrangements and allows Indie Education to check the effectiveness of the safety management system that is being introduced. Indie Education will put in place measures to rate effectiveness and identify any exposures or opportunities to improve health, safety and well-being within our colleges. Any issues highlighted are to be allocated to the right level within Indie Education who can ensure it is dealt with proportionately to the risk it poses.

4.30.2 Monitoring includes (but not limited to):

- (a) Accident/incident investigation
- (b) Accident statistics and trend monitoring
- (c) Near miss reporting
- (d) Planned Preventative Maintenance (PPM's)
- (e) Health Surveillance
- (f) Classroom inspections
- (g) Health and Safety Inspections
- (h) Health and Safety Management Audits
- (i) Governor meetings

4.31 New, Expectant and Nursing Mothers

- 4.31.1 In the event of an employee becoming pregnant, Indie Education shall make arrangements for a risk assessment to be completed, relating to the work operations of new and expectant mothers, and appropriate measures taken as a result, in compliance with the Management of Health and Safety at Work Regulations.
- 4.31.2 As far as reasonably practicable Indie Education will make provision for pregnant and nursing mothers as dictated by the risk assessment's findings.

4.32 Noise

- 4.32.1 Indie Education has a duty to protect the hearing of employees and learners who may be exposed to excessive levels of noise from work activities. The noise level will be kept to a minimum during a typical day within Indie Education with Noise levels unlikely to be injurious.
- 4.32.2 There is potential for staff to be exposed to noise levels above 80dB (A) when using equipment and tools. Noise levels identified on equipment will be followed and appropriate controls followed to reduce exposure to injurious noise levels of users and others in the vicinity.
- 4.32.3 A full noise assessment would be carried out if there are significant increases in noise levels on site due to processes or equipment/plant changes. This assessment will indicate whether reasonably practicable noise reducing measures can be implemented or if other control measures are to be considered.

4.33 Pedestrian, Traffic and Vehicle Management

- 4.33.1 The movement of vehicles around site car parks will be done in accordance with the relevant Site specific car park risk assessments and car park management plan. Under no circumstances must the movement and storage of vehicles prevent access in an emergency. Vehicles must not be parked blocking any emergency exits at any site.
- 4.33.2 Maintenance of safe pedestrian walkways/routes should be a priority at all times. If pedestrian routes cannot be maintained, this should be raised immediately with the Central Team and Health and Safety Competent Person and advice sought.
- 4.33.3 Car parks used at start and end of day should have appropriate level of supervision present when in use with staff members provided with adequate information, instruction, training and supervision to supervise car parks as expected.

4.34 Permits to Work

- 4.34.1 The requirement for a Permit to Work applies equally to employees, contractors and visitors. Those issuing permits shall be trained, validated and authorised by Indie Education.
- 4.34.2 Contractors must formally register all work on site, and where applicable follow the Permit to Work system.
- 4.34.3 Sites shall ensure that it complies with the Indie Education permit to work system for controlling the following types of high risk activity:

- (a) Hot works
- (b) Work at height
- (c) Electrical works
- (d) Fire system works
- (e) Gas works

4.34.4 Supervision will cover that the person(s) working under the PTW are:

- (a) Only doing the work defined in the scope on the PTW
- (b) Following the required controls defined on the PTW and related risk assessments and method statements
- (c) Behaving responsibly
- (d) Maintaining a safe and tidy work area

4.34.5 Tasks shall be stopped immediately in a safe manner if safety is compromised, and then reported to the appropriate supervisor, or line manager. Failure to comply with any Permit requirements or safe system of work will be reported to the CEO and may result in a contractor being removed from the site.

4.35 **Promotion of Health and Safety**

4.35.1 All employees are expected to have a positive attitude to health and safety. The CEO has ultimate responsibility for promoting a positive and active attitude and will constantly enforce the need for safe working on the company's premises.

4.35.2 This Health and Safety Policy is designed to promote a Positive Safety Culture, where everyone in the company understands the benefits of good health and safety.

4.36 **Safety Signage**

4.36.1 To protect the health, safety and welfare of our employees and others from the hazards and risks present in our workplace we need to use safety signs as a way of warning personnel that those hazards exist.

4.36.2 Signage is not to be used as the sole means of protection against a hazard. The hierarchy of control is to be followed to reduce the hazard to as low as reasonably practicable before signage is considered.

4.37 **Security**

4.37.1 The college actively ensure that the security of the site is assessed, and adequate arrangements are in place to control access into the Site/ Site grounds. All visitors are required to sign in at reception and required to wear a visitor's badge.

4.37.2 Indie Education safeguarding policy is to be followed at all times and information shared with those on site to ensure that any safeguarding or security concerns can be reported.

4.38 **Stress**

4.38.1 We recognise that we have a duty to take action to reduce and where reasonably practicable to eliminate ill health which is caused by work related stress. We will do this by:

- (a) Developing and implementing a policy for identifying and managing work related stress.
- (b) Involving our workforce in the development of this policy and our procedures.
- (c) Providing information about the policy to all workers.
- (d) Training the Management Team to recognise symptoms of work-related stress.
- (e) Ensuring that the policy is adopted and followed.
- (f) Ensuring employees know what to do if they suspect they, or a colleague, are suffering from stress.
- (g) Monitoring and reviewing the policy and procedures; using our experience of operating these arrangements we aim to make improvements to the way we manage ill health caused by work related stress.

4.39 **Training**

4.39.1 Indie Education is committed to ensuring that all members of staff shall be provided with skills, knowledge and training to be competent of the duties expected of them in their role. Indie Education will ensure that standards and processes detailed in Indie Education's policies and procedures are maintained.

4.40 **Violence and Aggression**

4.40.1 Indie Education is committed to providing a safe and secure working and educational environment for staff, learners, and any other persons on its site. Where applicable, in addition to the control measures identified in an individual learner's physical intervention, the following procedures are in place:

4.40.2 Staff are advised to:

- (a) Avoid confrontation if possible.
- (b) Withdraw from situation if safe to do so to get support.
- (c) Arrange seating so that a clear escape route from the room to a place of safety is available. Sit near the door or use a room with two doors.
- (d) Follow measures/ procedures identified in violence/ assaults and lone working risk assessments.
- (e) Contact emergency services, as appropriate.
- (f) Inform the CEO if confrontation has taken place

4.40.3 The Indie Education will:

- (a) Ensure the CEO team attend site on being informed of an incident, if considered necessary.
- (b) Have in place procedures for the reporting of incidents.
- (c) Offer counselling/ support through Occupational Health.

- (d) Debrief individuals following any incident.
- (e) Provision of training on how to manage conflict and aggression as required.
- (f) Review specific risk assessment following any incident.

4.41 Visits by Regulatory Authorities

- 4.41.1 The CEO is responsible for all visits, if unavailable there shall be a nominated deputy. Where possible visits shall be arranged, agreed, in advance. Support will be provided by Indie Education ELT and YMD Boon as required.
- 4.41.2 The CEO shall communicate the results, or findings, of any visit.
- 4.41.3 If Indie Education is being investigated, legal counsel shall be notified immediately, and advice obtained on how to proceed.
- 4.41.4 Indie Education contacts shall:
 - (a) Accompany the visitor at all reasonable times.
 - (b) Ensure the safety of the visitor at all times.
 - (c) Photocopy and retain any records the visitor may take offsite.
 - (d) Take duplicate photographs and retain on site, if applicable.
 - (e) Provide facts to visitor and not personal opinions.

4.42 Welfare at Work

- 4.42.1 Indie Education will provide a safe place of work and working environment. Indie Education will ensure that suitable welfare facilities, as well as a safe means of access and egress to and from every place at which any of the facilities are provided. Welfare provisions provided include:
 - (a) Adequate ventilation
 - (b) Reasonable temperature including a means of heating
 - (c) Appropriate lighting, windows/glazing, skylights and ventilators
 - (d) Maintenance of cleanliness
 - (e) Adequate room dimensions and space
 - (f) Safe workstations and seating
 - (g) Managed risks from the potential for falls or falling objects
 - (h) The safe condition of floors and traffic routes
 - (i) Appropriate sanitary and washing facilities
 - (j) The provision of clean drinking water
 - (k) The provision of accommodation changing and drying facilities for clothing
 - (l) The provision of a rest room or other area to rest and to eat meals

4.43 Work at Height

- 4.43.1 The college will follow the principles of the HSE guidance 'The Work at Height Regulations 2005 (as amended) A brief guide' (INDG401).

4.43.2 The college may use a variety of access equipment for working at height tasks, ranging from kick stools for short low risk access to step ladders and ladders for short duration works and will ensure that:

- (a) Working at height is avoided wherever possible.
- (b) If it cannot be avoided, working at height is properly risk assessed and is completed by competent staff and carried out in a planned manner which is, so far as is reasonably practicable, safe.
- (c) Those undertaking work at height have received appropriate training and training records are maintained.
- (d) All access equipment (ladders & step ladders) is identified and inspected annually.
- (e) Any equipment provided to assist with working at height tasks is maintained and serviced in accordance with statutory requirements.
- (f) Any defective equipment is taken out of use until repaired or is replaced.
- (g) An individual risk assessment will be completed for all staff with identified medical conditions that may be affected by undertaking working at height tasks, these may result in some working at height tasks being restricted.
- (h) Any accidents resulting from working at height will be investigated to identify root causes and implement additional controls as required.

4.44 **Work Equipment**

4.44.1 The main objective is to ensure work equipment presents no health and safety risks, regardless of age, condition or origin.

4.44.2 It applies to all work equipment, including mobile and lifting equipment and equipment that is hired. For example, hammers, knives, saws, drills, photocopiers, lifting equipment, ladders, pressure water cleaners, scaffolding, company cars, and any equipment linked together to form an installation. It also applies to work equipment owned by Indie Education, used by employees at home.

4.44.3 Equipment shall be suitable for intended purpose. Equipment purchased shall be designed and constructed to comply with European safety requirements with CE marking and a copy of the 'Declaration of Conformity' supplied.

4.44.4 Risk assessments will be completed on work equipment to ensure any hazards present are controlled and the risk level reduced to as low as reasonably practicable. Indie Education shall prevent access to any dangerous part of machinery or stop the movement of any dangerous part of the machinery before any part of a person enters a danger zone and met the relevant standards including suitable training and instruction.

4.44.5 Work equipment shall be capable of being isolated from all of its energy sources. Isolation devices shall be easily accessible and identifiable.

4.44.6 Information, instruction, training and supervision will be provided to users of equipment to ensure they are able to use equipment provided for work tasks as it is designed and intended to be used.

4.45 **Maintenance of Equipment**

- (a) Equipment shall be maintained in good working order and in good repair.
- (b) Where equipment requires, or has, a maintenance log (high-risk equipment), the log shall be kept up to date.
- (c) Maintenance schedules shall follow manufacturer's instructions, industry best practice or legislative requirements.
- (d) Frequency of maintenance depends on use, environment, variety of operations and the risks if it failed.
- (e) Appropriate maintenance techniques shall be selected through risk assessment.
- (f) If equipment is hired, Indie Education shall prepare a written agreement with the hire company which details who carries out the maintenance, and to what frequency.
- (g) Only competent people shall carry out maintenance.
- (h) Maintenance operations shall not pose a risk to health and safety.

4.46 **Equipment Inspection**

- (a) Where a risk of significant injury exists to people, the equipment shall be regularly inspected (for example, visual, functional and testing).
- (b) Inspection will include safety-related parts.
- (c) Inspection shall be done by a competent person, avoiding danger to themselves.
- (d) Indie Education shall also inspect prior to initial installation, after re-installation or re-assembly, major modifications or repairs, change of use, known serious damage, any condition causing deterioration of equipment.
- (e) Frequency of inspections depends on equipment type, use and environment.
- (f) Records shall include: type & model, identification mark, serial number, location, date, who inspected, faults found, action taken, who reported fault, date of repairs.

4.47 **Young Persons**

- 4.47.1 All risks to young persons (under 18 years and over the Minimum School Leaving Age (MSLA)) will be assessed before they start work, considering their inexperience, lack of awareness of existing or potential risks, and immaturity, specific factors in the risk assessment will be addressed.
- 4.47.2 Information will be provided to the parents/guardians of children on Work Experience about the risks and control measures introduced. Account will be taken of the risk assessments to determine whether the young person should be prohibited from certain work activities, except when they are over MSLA, and it is necessary for their training and where risks are reduced so far as is reasonably practicable, and where proper supervision is provided by a competent person, in

compliance with the Management of Health and Safety at Work Regulations 1999.

5. POLICY REVIEW

- 5.1.1 Indie Education Health and Safety Policy will be reviewed at least on a three-year basis, or when there are significant changes to the Indie Education's arrangements and updated accordingly.
- 5.1.2 Provision will also be made for review in the event of the introduction of new legislation, the amendment of existing legislation, Approved Codes of Practice (ACoPs) or guidance notes via the Indie Education's appointed Health and Safety Competent Person.
- 5.1.3 Employees are encouraged to bring to the attention of the CEO areas they in their opinion this policy appears inadequate. Such comments will be considered for review.

6. RELATED DOCUMENTS

6.1 Acts of Parliament

- The Corporate Manslaughter and Homicide Act - 2007
- Health and Safety at Work etc Act 1974
- Health and Safety (Offences) Act 2008
- Offices, Shops and Railway Premises Act 1963
- The Regulatory Reform (Fire Safety) Order – 2005
- The Fire Safety Act 2021
- Building Safety Act 2022

6.2 Regulations

- Confined Spaces Regulations 1997
- Construction (Design and Management) Regulations 2015
- Control of Asbestos Regulations 2012
- Control of Noise at Work Regulations 2005
- Control of Substances Hazardous to Health Regulations 2002
- Control of Vibration at Work Regulations 2005
- Dangerous Substances and Explosive Atmospheres Regulations 2002
- Electricity at Work Regulations 1989
- Gas Safety (Installation and Use) Regulations 1998
- Gas Safety (Management) Regulations 1996
- Gas Safety (Rights of Entry) Regulations 1996
- Health and Safety (Miscellaneous Amendments and Revocation) Regulations 2017
- Health and Safety (Consultation with Employees) Regulations 1996
- Health and Safety (Display Screen Equipment) Regulations 1992
- Health and Safety (Enforcing Authority) Regulations 1998

- Health and Safety (First- Aid) Regulations 1981
- Health and Safety (Safety Signs and Signals) Regulations 1996
- Health and Safety (Training for Employment) Regulations 1990
- Health and Safety Information for Employees (Amendment) Regulations 2009
- Health and Safety Information for Employees (Modifications and Repeals) Regulations 1995
- Health and Safety Information for Employees Regulations 1989
- Lifting Operations and Lifting Equipment Regulations 1998
- Management of Health and Safety at Work Regulations 1999
- Manual Handling Operations Regulations 1992
- Personal Protective Equipment at Work Regulations 1992
- Pressure Systems Safety Regulations 2000
- Provision and Use of Work Equipment Regulations 1998
- Radiation (Emergency Preparedness and Public Information) Regulations 2001
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013
- Safety Representatives and Safety Committees Regulations 1977
- Work at Height (Amendment) Regulations 2007
- Work at Height Regulations 2005
- Workplace (Health, Safety and Welfare) Regulations 1992

7. AUTHORISATION

- 7.1 This document has been authorised by the Chief Executive Officer.