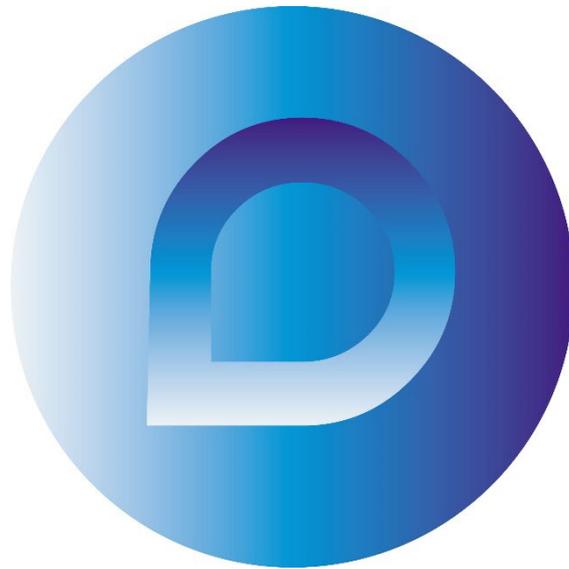


Health and Safety Policy And Arrangements



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1.0 Introduction

The BDG Ltd and associated companies believe health and safety is a vital ingredient in the success of this organisation. A good health and safety culture is an essential element in making all employees, volunteers, learners, service users, contractors, visitors, and the general public feel valued and respected. The mechanisms needed to drive good health and safety underpin good management and serve as a steppingstone in achieving excellence.

Under the Executive Chairman leadership, the BDG Ltd and associated companies also recognizes that health, both physical and mental well-being, is a critical part of health and safety and indeed a critical part of BDG Ltd success.

2.0 Policy Context

The BDG Ltd and associated companies (BDG for future reference in this document) adopt and adhere to the following policy and arrangements (mechanisms).

This policy statement relates to the health and safety of the BDG employees, volunteers, learners, service users, contractors, visitors, and the general public in connection to all its activities. The BDG is required under the provisions of the Health and Safety at Work Act 1974 (The Act), to produce a statement of policy with respect to the health and safety of everyone who uses BDG premises or may be affected by BDG activities. However, this is only a starting point, and the BDG will continually strive to achieve the highest practical standard rather than rely on the legal minimum. The BDG also expects managers at all levels to actively pursue increasingly higher standards of health and safety management.

The BDG will review its Health and Safety Policy and Arrangements on an annual basis and check that it and its staff and associates, where appropriate, are adhering to the policy and will undertake to act wherever possible.

The Health and Safety Policy and Arrangements is intended to bring the BDG statement of health and safety policy to the attention of all its employees, volunteers, learners, and service users and to provide details of the organisation and arrangements for carrying out that policy, as indicated by the Act. The health and safety policy statement is supplemented by individual arrangements (procedures) covering a range of topics and everyone must ensure they are aware of the safety precautions appropriate to the area in which they undergo BDG activities.

2.1 Related Documents (Arrangements)

- By Design Corporate Risk Policy
- By Design Driving at Work Policy
- By Design Food Hygiene Policy
- By Design Lone Working Policy
- By Design Staff Training and Development Policy
- NCS Crisis and Incident Reporting Guide
- By Design Driving Risk Assessment
- By Design Office Risk Assessment
- NCS Risk Assessments

2.2 Other Documents and Procedures in Place

- By Design Business Continuity Policy
- By Design Data Protection Policy
- By Design DBS Security Policy
- By Design Environmental Policy
- By Design Gender Equality and Equal Opportunities Policy
- By Design Grievance and Disciplinary Policy
- By Design Induction
- By Design Office Systems
- By Design Procurement Policy
- By Design Quality Assurance Policy
- By Design Recruitment Policy
- By Design Safeguarding Policy
- By Design Vulnerable Adults Policy
- NCS Crisis and Incident Reporting Guide
- NCS Whistleblowing Policy

3.0 General Health and Safety Policy Statement - BDG Ltd and Associated Companies

The BDG Ltd and associated companies (BDG for future reference in this document) will take all practical and reasonable steps (precautions) to protect employees, volunteers, learners, service users, contractors, visitors, and the general public from ill-health, work related injury; diseases or harm, related to BDG activities.

BDG commits that the promotion of employee well-being and the provision of a safe working environment is an essential part of the organisations operating philosophy.

The Executive Team and Executive Chairman of BDG in conjunction with the Management Team has overall responsibility for ensuring that BDG maintain high standards of health and safety. However, BDG rely on all BDG employees and sub-contractors to play their part in implementing the BDG health and safety policy and drawing to the attention of the Executive Team and Executive Chairman, areas in which improvements can be made. Compliance with legislative requirements is the minimum standard that the BDG will accept, and its aim is to achieve continuous, cost-effective improvements in performance and the adoption of best practice.

As a provider of quality educational services working to the highest standards, we bring education to life by using a range of innovative and creative methods to engage and motivate learners. The BDG recognize the potential impact of our activities on employees, young people, and members of the public, and strive to maintain safe working practices when working on- and off-site.

The Executive Team and Executive Chairman has appointed the BDG Governance and Compliance Manager as the Health and Safety Lead with responsibility for guiding the Executive Team, Executive Chairman and BDG Management Team on health and safety matters.

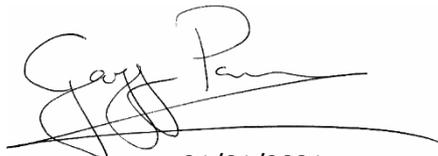
The BDG strategy will be achieved by:

1. Recognizing that the management of health and safety is the responsibility of BDG Managers at all levels.
2. Recognizing that objectives can only be achieved with the support, commitment, and active participation of all BDG employees.
3. Providing and maintain a safe and healthy working environment including safe access arrangements and suitable welfare facilities.
4. Provide information, instruction, training, and supervision to enable employees to perform their work safely.
5. To gain the full commitment of employees, BDG will ensure that:
 - a. Promote a positive and market-leading health and safety culture within the BDG, by the Executive Team and Executive Chairman of BDG in conjunction with the Management Team.
 - b. Employees, volunteers, learners, service users or their representatives are involved, consulted, and encouraged to actively take part in all elements of health and safety management systems.
 - c. All employees are aware of their general and specific responsibilities for health and safety.
 - d. All employees receive appropriate information and training and are competent to carry out their duties and responsibilities.
6. Undertake risk assessments, implement the identified control measures, and ensure that safe systems of work are applied in relations to all BDG activities.
7. Take steps to assess the competence of any contractor BDG engage and to ensure that information is exchanged on matters relevant to health and safety.
8. Be prepared for emergencies such as fire and medical emergencies and investigate all incidents of injury or ill health.
9. Recognize and effectively manage specific health and safety responsibilities in relation to vulnerable persons such as young people and those with disabilities.
10. The company is committed to ensuring that the implementation of the health and safety management system is adequately resourced to enable the full implementation of the BDG health and safety policy. This commitment includes the provision of sufficient financial resources, management and employee time, training and health and safety advisory support.

It is the responsibility of the Executive Team and Executive Chairman of BDG to monitor the implementation of the BDG health and safety policy and the company's overall health and safety performance by receiving regular health and safety reports from the appointed health and safety lead.

This general health and safety policy statement will be reviewed at least annually or more frequently where there have been significant changes to the company or the nature of the company's activities.

Signed:



Date: 21/01/2021

Geoff Parsons
Executive Chairman

Signed:



Date: 21/01/2021

Stephen Frew
Health and Safety Lead

4.0 Health and Safety Organisational Chart



5.0 Roles and Responsibilities

5.1 BDG Limited Board of Directors

BDG is responsible for:

- Setting the health and safety aspirations for BDG operating companies, including Learn by Design Ltd.
- Supporting the Group's operating companies, including Learn by Design Ltd, in achieving the implementation of this health and safety policy and monitoring that adequate resources are available for this purpose.
- Monitoring the health and safety performance of Learn by Design Ltd, reviewing performance and identifying opportunities for improvements.
- Promoting a robust and positive health and safety culture throughout the BDG.
- Ensuring that the health and safety practices of Learn by Design are consistent with the Group and its other operating companies.

5.2 Learn by Design Limited Board of Directors / Executive Chairman

The Board and Executive Chairman is responsible for:

- Always demonstrating leadership on health and safety matters both as a group and as individuals.
- Appointing a Director / Chief Operating Officer to take the lead on health and safety matters.
- Ensuring the company acts in accordance with BDG's health and safety ethos.
- Revising the health and safety policy at least annually or when there are significant changes.
- Reviewing the health and safety performance at least 6 monthly by receiving reports from the Health and Safety Lead.
- Agreeing health and safety targets and objectives for the company and monitoring their implementation and progress.
- Receiving investigation reports of serious incidents and work-related ill health and responding effectively to those reports.
- Reviewing the effectiveness of measures to consult with and involve the workforce in health and safety.
- Considering the health and safety implications of introducing new working practices, new personnel, or other significant business change, at the planning stage and taking the action necessary to mitigate any increased risk.
- Ensuring that no significant changes to the business are introduced without dedicating sufficient resources for health and safety purposes and managing the change effectively and arranges for reports on the health and safety impact of the changes once introduced.
- Ensuring that the company has access to competent advice on health and safety and fire safety, including access to specialist advisors where necessary.
- Considering health and safety needs when deciding management appointments.
- Ensuring board members receive a briefing on health and safety requirements from a competent person on appointment as a Director / Chief Operating Officer.
- Receiving regular update briefings on new and changed legal requirements and other external developments and ensuring that action is initiated to make any necessary internal changes.

5.3 Health and Safety Lead

The company Health and Safety Lead will:

- Take a leadership role on health and safety matters by setting a good example and acting promptly where deficiencies are identified.
- Ensure there are adequate resources to implement the health and safety policy.
- Ensure that the health and safety content of Board meeting agendas meets the policy requirements detailed above.
- Review this policy at least annually or more frequently where appropriate.
- Appoint the company's health and safety "competent person" and other specialist advisors as required.
- Keep the Executive Team and Executive Chairman informed of:
 - Accidents, incidents, and work-related ill health issues which caused or had the potential to cause serious injury or ill health.
 - Any proposed changes to the premises, activities, or management structure.
 - Any new hazards not already identified within risk assessments which have been brought to his attention.
 - Any visits by, or correspondence with, enforcement authorities.
 - Any difficulties or delays in implementing advice provided by specialist advisors.
- Review the health and safety standards and practices of the company on an ongoing basis.
- Investigate serious accidents, incidents and cases of ill health that are alleged to be work-related, seeking assistance from a/the health and safety "competent person" where necessary and ensuring statutory reports are made for serious incidents in accordance with the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR).
- Ensure that there is an effective mechanism for consulting with employees on health and safety matters through staff meetings / briefings.
- Ensure that there are appropriate arrangements for the selection and training of employees, considering health and safety competence and attitude requirements.
- Ensure that managers, supervisors, and senior staff are aware of the importance of enforcing health and safety rules and leading by example by following the rules themselves.
- Oversee the purchase of equipment and materials to ensure that safety requirements are met and that relevant information such as instructions and safety data sheets are supplied.
- Ensure that for equipment or materials purchased from outside the EU and the Company is the 'importer', arrangements are made to ensure that EU product safety legislation and material labelling requirements are met.

5.4 Chief Operating Officer

The Director of Programmes has managerial and strategic responsibility for all educational services and community development programmes except the National Citizen Service.

The Director of Programmes health and safety responsibilities are to:

- Take a leadership role on health and safety matters by setting a good example and acting promptly where deficiencies are identified.
- Consult with employees on health and safety matters during staff meetings.
- Plan the work of staff to avoid dangerously excessive working or driving hours.
- In the selection of employees, consider the health and safety competence requirements.

- Manage to provision of appropriate skills / health and safety training to employees on starting employment and when their job role or work activities change, reviewing training needs during annual appraisals.
- Through management ensure that staff are only given tasks for which they are competent, and that adequate staffing is provided for the safe completion of tasks.
- Ensure contractors are sufficiently supervised and monitored to the extent that this is practicable and necessary having regard to the work activities and the competence of the workforce.
- In the purchase of equipment and materials, ensure that safety requirements are met and that relevant information such as instructions and safety data sheets, are supplied.
- Ensure that work equipment, vehicles and personal protective equipment are suitable for purpose, supplied where necessary and properly maintained.
- Only select construction and maintenance contractors who have demonstrated their competence and resourcing to undertake the work safely and ensure that contractors receive and are requested to provide, adequate information for them to carry out their work safely and without adversely affecting others.
- Work with the Health and Safety Lead to ensure that risk assessments are undertaken to cover general hazards and specific risks to vulnerable people.
- Ensure that risk assessments are acted upon and that the results are shared with employees undertaking those activities.
- Instruct managers, supervisors, and seniors in their specific responsibilities and review their success in meeting their obligations both on an ongoing basis and formally during their annual appraisal.
- In the absence of the Executive Chairman, take on other aspects of their role as necessary e.g., accident investigation and liaison with the Health and Safety Lead.
- Report to the Executive Chairman any health and safety concerns which the Director of Programmes is not able to resolve.

5.5 Chief Operating Officer and Director of National Citizen Service (NCS)

The Director of NCS has managerial responsibility for the National Citizen Service (NCS) Programme.

The Director of NCS health and safety responsibilities are the same as the Director of Programmes, and in addition specifically in relation to NCS to:

- Ensure that contractual arrangements with third party providers clearly define respective health and safety responsibilities.
- Comply with the health and safety contractual requirements of the Prime NCS Contractor(s).
- Ensure that the risk assessments for the elements of the NCS Programme are continually reviewed and recommended control measures are in place.
- Ensure that specific risks to young people are identified and managed effectively.
- Ensure that the level of health and safety training and competence for NCS Team employees, including seasonal workers, is sufficient.

5.6 Managers / Supervisors / Seniors

Managers, supervisors, and seniors have managerial responsibility to:

- For day-to-day safety matters on behalf of the company.
- Each manager, supervisors, and seniors shall ensure that risk assessments, and operating procedures provided are effective to cover the work and that all risks are effectively controlled.

- Managers, supervisors, and seniors are responsible for ensuring that staff and contractors under their control are competent to perform the work activities required of them and have received sufficient information, instruction, training, and supervision.
- Managers, supervisors, and seniors are also responsible for ensuring that risk assessments are effectively communicated to staff within their control, and that the control measures within the risk assessments are being observed.
- Managers, supervisors, and seniors will ensure that any unsafe acts or conditions observed by them or brought to their attention are either resolved or reported to their line manager without delay.
- Managers, supervisors, and seniors will undertake and record any regular safety inspections or checks required, for example PPE or equipment, and action any deficiencies observed.
- Managers, supervisors, and seniors will assist their line managers and the Health and Safety Lead in monitoring the safety performance of employees and contractors, investigating any deficiencies, and ensuring that corrective action is taken when required.

5.7 BDG Employees

All BDG employees must take care of themselves, and others affected by their work and are expected to:

- Familiarize themselves with this health and safety policy and risk assessments relevant to their work activities, comply with the requirements set out and raise any shortfalls in the content with their supervisor.
- Follow the safety rules and their training for the work activity and the location.
- Know the emergency procedures for the location at which they are working.
- Use vehicles, equipment, materials, or substances in accordance with information, instruction and training provided by the Company.
- Not use defective equipment or misuse equipment.
- Wear personal protective equipment issued appropriate to the job they are doing if required.
- Look after personal protective equipment and report loss or damage to their supervisor.
- Report any safety problems, accidents or near misses to their supervisor.
- Not work under the influence of alcohol or drugs.

5.8 Contractors

All contractors must take care of themselves, and others affected by their work and are expected to:

- Have a clear understanding of respective health and safety responsibilities when working on behalf of Learn by Design Ltd (LBD), and carry out their responsibilities fully.
- Comply with the stated health and safety requirements of LBD and the BDG.
- Report any safety problems affecting LBD contracted work to the appropriate LBD manager.
- Work with LBD to address identified health and safety risks as the contract progresses.

5.9 Clients

All LBD service users are expected to:

- Provide a safe place of work, and safe working procedures, emergency arrangements and adequate welfare facilities as appropriate, for LBD employees working at their premises.

No Director, manager, or employee of Learn by Design Limited may undertake or authorize any activity which places employees, or others, in danger, or is in breach of legal requirements with respect to health and safety.

6.0 Health and Safety Management Arrangements

6.1 Advice and Assistance (Management of Health and Safety at Work Regulations 1999)

- It is the Company's policy to have access to a 'Competent Person' for health and safety matters as required by the Management of Health and Safety at Work Regulations 1999. The Company has an arrangement to seek competent person advice from Safety Forward Ltd.
- The BDG will use other sources of advice on health and safety including the Health and Safety Executive information accessed via the website www.hse.gov.uk.
- Specialist assistance on health and safety matters will be sought from suitably qualified and accredited entities as required.

6.2 Communication and Consultation (Consultation with Employees Regulations 1996)

- The BDG will consult with and involve all persons working with BDG on all matters relating to health and safety and welfare. This will be done by daily informal contact, at staff meetings, during inductions, briefings, and training sessions.
- Health and safety noticeboards will be prominently displayed at company headquarters.
- Everyone is encouraged to discuss and have responsibility for a safe workplace.
- The Executive Team have an "open door" policy for health and safety concerns and will investigate all concerns without blame and refer for consideration by the Board and Executive Chairman as appropriate. The Board and Executive Chairman will feed back a response to those raising the concern.
- Should anyone not understand any instructions or information given through lack of ability or language difficulties then the BDG will take positive action to address this on an individual basis.
- Managers, supervisors, and seniors will check to confirm that staff understand key information by questioning and observing actions / behaviour.

6.3 Risk Management (Management of Health and Safety at Work Regulations 1999)

- The management of risk is a central part of the BDG strategic management. In respect of this the company have identified the following significant risks to the organisation:
 - Lone working
 - Driving
 - Working with vulnerable groups including young people
 - Safeguarding
 - Ex-offenders
 - Staff recruitment and training including seasonal employees.

These are subject to stringent control and have their own dedicated policy and procedure to provide guidance on mitigation. In addition to these risks BDG examines the causes of accidents, incidents and near misses to identify trends and any areas of potential weakness.

- Risk assessment methods are used to identify risk(s), decide on priorities, and set objectives for eliminating hazards and reducing risks. Wherever possible, risks are eliminated through the selection and design of facilities, equipment, and processes. Where risk cannot be eliminated, they are minimised by the use of physical control systems, systems of work and, where necessary, personal protective equipment.

- Risk assessments of health and safety and environmental hazards and the identification of relevant control measures is a vital part of good business management. It is also a legal requirement for risk assessments to be carried out by those who control the work. Each part of the BDG must identify the hazards associated with its activities, assess the risks arising from them and identify and implement appropriate control measures where these risks are significant.
- Risk assessments must be recorded and must be reviewed in the event of significant change(s) to the workplace and/or the work activity, following an accident or incident, or when new legislation, information or guidance on the hazard is published.

6.4 Monitoring, Review and Audit of Health and Safety Performance (Management of Health and Safety at Work Regulations 1999)

- The BDG will regularly monitor historical and current health and safety performance and act on the findings of internal and external health and safety audits to continually improve standards.
- The Health and Safety Lead will define and support an appropriate programme of health and safety monitoring, review and audit and report findings to the Executive Team, Executive Chairman and Board for their consideration.
- Managers, supervisors, and seniors will monitor, through supervision and appraisals, the performance of individuals for whom they are responsible and assess whether they are competent to carry out the activity and implement the associated control and emergency procedures.
- Managers, supervisors, and seniors will act on the findings of safety inspections, risk assessments and audits to ensure agreed control measures have been implemented, and that safety procedures are being followed.
- The safety performance of equipment, vehicles and control measures will be monitored.

These performance measures form the basis of self-regulation and development of a robust health and safety culture which is not afraid to self-diagnose, recognize, and address areas for improvement.

6.5 Competence and Training (Health and Safety at Work etc. Act 1974)

- Staff training and development is managed in accordance with the BDG Staff Training and Development Policy.
- Training and development will be carried out as and when required to meet the BDG business needs, and in accordance with the BDG health and safety risk assessments.
- Where specific health and safety skills or competencies are required, this is defined within job descriptions.
- At recruitment, BDG assess the skills, experience, and previous training of the applicant in order to appoint the most suitable person for the job.
- Training needs are reviewed at recruitment of new starters and then on an ongoing basis for example: because of risk assessments or accident investigations; through site inspections or audits; and arising from changed legislation or standards.
- All employees (and sub-contractors) are inducted in the contents of this policy with particular emphasis on their personal responsibilities. All new employees also receive basic induction training on general health and safety matters, including:
 - their legal duties, as set down in both criminal and civil law.
 - The findings of risk assessments.
 - First-aid arrangements.
 - Fire, evacuation drills and other relevant emergency procedures.
 - Expected standards of behaviour and housekeeping.

- How to report accidents, incidents and ‘near-misses’.
- How to report unsafe conditions or other safety concerns.
- Any special hazards and control arrangements affecting the workplace.
- A general safety induction is carried out by Learn by Design managers, supervisors, or seniors, and a signed record is kept.
- Where an individual takes on specific health and safety responsibilities, they will receive relevant health and safety training in their responsibilities.
- Training will also be provided at the introduction of new equipment, new technology or work procedures. Young workers i.e., those under 18 years old, will receive additional training and supervision as required, according to the outcome of an individual assessment.
- BDG consult with staff about the planning and organising of health and safety training by discussing at staff meetings.
- All health and safety training is provided by competent instructors and takes place during paid working hours. The identification of training needs is carried out in accordance with the BDG Staff Training and Development Policy.

7.0 Operational Arrangements

7.1 Accidents, Incidents and Work-Related Ill Health (RIDDOR 2013)

- It is the practice and BDG policy that all accidents and injury, however minor, are recorded on the BDG Accident Report Form. Staff are instructed in this policy on starting work with the BDG.
- All accidents and incidents are investigated to determine the causes and any actions necessary to prevent a recurrence. Where the accident caused, or had the potential to cause, serious injury, the investigation is conducted by a senior manager with input from a Director, the Health and Safety Lead and/or the health and safety “competent person” as required.
- If an employee informs a manager of ill health which the employee believes to be work related, it is investigated in a similar way as other untoward incidents, with occupational health advice being obtained, as necessary.
- The Health and Safety Lead is responsible for recording and reporting incidents which fall within the recording and / or reporting requirements of the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR). All such incidents and any other incidents of a similarly serious nature are also reported to BDG insurers.
- All accident records and associated information are filed confidentially and retained for ten years.
- Accident trends, learning points and the outcome of investigations of serious incidents are discussed at Board and Executive Team meetings.
- Accidents and Incidents occurring as part of the NCS Programme are reported in accordance with the NCS Crisis and Incident Reporting Guide. RIDDOR-reportable accidents / incidents under the NCS programme are reported by Pharos.

7.2 Alcohol, Drugs and Medicines (Health and Safety at Work etc. Act 1974)

The consumption of alcohol or non-prescription drugs in the workplace is not permitted.

Disciplinary action will be taken against any BDG employee undertaking BDG work whilst under the influence of alcohol or non-prescription drugs.

Some prescription and non-prescription medication can impair a person’s ability to perform their work safely. In these cases, employees must cease work immediately and report to their supervisor/manager.

7.3 Asbestos management (Control of Asbestos Regulations 2012)

Our buildings are known to be free of asbestos containing materials.

7.4 Buildings / Premises Health and Safety

The responsibility for premises health and safety at 49 Kepler, Tamworth, Staffordshire including maintenance, electrical safety, gas safety, safety signs and notices, water hygiene and welfare facilities is under the control of BDG Limited.

7.5 Contractors

- BDG recognize that when BDG engage contractors to work on BDG premises, we have obligations to plan, monitor and control their work for the safety of everyone who could be affected by their activities. The contracting organisation also holds similar responsibilities, and it is therefore our policy to work together with carefully selected competent contractors to ensure that BDG workplace remains safe and without risk to health.
- BDG also recognize that when we engage contractors to deliver activities on behalf of LBD, BDG have obligations to ensure that they are competent to undertake the contracted work, and their health and safety risk management is effective. BDG will ensure that there is clear communication and allocation of health and safety responsibilities when working with our contractors to achieve safe working.
- When BDG undertake work for Prime Contractors we will comply with their health and safety arrangements and ensure we bring any safety concerns to their attention. BDG will be clear about our respective health and safety responsibilities.

7.6 Disabled Persons Including Temporarily Disabled (Equality Act 2010)

BDG comply with the provisions in the BDG Gender Equality and Equal Opportunities Policy.

- Where BDG employ persons with disabilities, or where existing employees become disabled, BDFG ensure that the workplace is adapted for their needs including arrangements to ensure their health and safety and welfare.
- In the case of temporary disability such as a broken limb, adaptations may not be reasonably practicable in the short timescales involved and it may be necessary to exclude the individual from BDG workplace as an alternative.
- When individuals have been issued with a fit note by a doctor, they are not permitted to work unless either the date to which they have been signed as unfit to work has been reached or, if the fit note indicates they may be fit to work subject to conditions, that those conditions have been assessed and relevant changes have been made to meet them.
- Where appropriate BDG will obtain advice from an occupational health advisor.
- BDG ensure that the needs of disabled staff are taken account of within risk assessments and if necessary, undertake an individual risk assessment for the work of the employee, considering their abilities and disabilities.
- BDG will also develop a personal emergency evacuation plan (PEEP) if required.
- Relevant risk assessments and the PEEP will be reviewed at frequencies which take account of any change in the person's health condition.

- BDG will ensure that our educational services are inclusive wherever possible and will make adjustments to enable participation by people with disabilities.

7.7 Display Screen Equipment (DSE) (The Health & Safety (DSE) Regulations 1992)

Suitable furniture is provided in BDG offices, including adjustable chairs at computer workstations.

- Sufficient space is provided for the needs of each user including the provision of storage space away from the desk where necessary.
- Desks are sited so far as is possible so that glare, reflections and extremes of light and shade do not cause discomfort. Window blinds are also provided to assist in the control of these hazards.
- BDG work environment has been designed for the comfort of display screen users considering the need to control nuisance noise, temperature, humidity, and lighting.
- Software is selected for its suitability for the task and ease of use.
- Workstation checklists are completed by each DSE user and reviewed by the Health and Safety Lead and / or office manager. If any improvements are identified and required to individual workstations these are implemented by the BDG. The outcome of assessments is shared with each 'user'.
- Staff using mobile devices including laptops, tablets, smart phones etc. whilst on the move, they are encouraged to work as ergonomically as possible and made aware that intense and prolonged screen work is best carried out at a permanent workstation.
- Workstation assessments are reviewed every 2 years and whenever there has been a change to the workstation or the tasks undertaken, or a problem reported by the DSE user.
- Records of workstation assessments are retained for at least 5 years and master copies are retained by the Health and Safety Lead / office manager. As display screen assessments may contain health information, they are filed confidentially.
- Eye and eyesight examinations are provided by the BDG on request and, where needed solely for the use of the equipment, the cost of a basic pair of spectacles is also reimbursed.
- Employees who are designated 'users' are provided with training in the hazards of display screen use, the precautions for safe working, including when working on the move, and the arrangements for obtaining eye and eyesight testing. This training is provided when they first begin working with display screen equipment.
- Employees are encouraged to promptly report any problems including health concerns, to their line manager who is responsible for arranging a reassessment of the workstation and any corrective action required. If the matter is not easily resolved, assistance will be obtained from the Health and Safety Lead, "competent person" or an occupational health specialist.
- The guidance in the BDG Telephone, Email and Internet Use Policy is observed.

7.8 Driving & Company Vehicles (Health and Safety at Work etc. Act 1974)

BDG will comply with the guidance in the BDG Driving Policy, including the completion of a Driving Risk Assessment where appropriate.

7.9 Electrical Safety (Electricity at Work Regulations 1989 and PUWER Regulations 1998)

BDG staff are clearly instructed that they are not permitted to undertake any electrical repairs. All work on electrical equipment and installations is carried out by competent and suitably qualified electrical contractors.

Fixed electrical testing for the company headquarters is the responsibility of the BDG Ltd.

Our arrangements for the electrical safety of portable electrical equipment including office equipment, training equipment and personal electrical items are covered in the section of this policy on Work Equipment.

7.10 Ex-Offenders

BDG will comply with the guidance in the BDG Policy on the employment of ex-offenders.

7.11 Fire and Other Emergencies (Regulatory Reform (Fire Safety) Order 2005)

The fire safety management at the company headquarters at 49 Kepler, Tamworth, is the responsibility of the BDG Ltd. There is an up-to-date fire risk assessment, and employees of Learn by Design cooperate and comply with the occupant requirements to maintain good fire safety.

Fire safety management at off-site locations is the responsibility of the site owners. Learn by Design employees and scheme participants will comply with the site-owner's fire and emergency arrangements.

Emergency arrangements for the NCS scheme are described in the NCS Crisis and Incident Reporting Guide and these arrangements will be complied with by BDG Directors, Executive Team, Managers, and employees.

Learn by Design will also observe the arrangements described in the BDG Business Continuity Policy.

7.12 First aid (The Health and Safety (First Aid) Regulations 1981)

Learn by Design shares first aid provision with the BDG Ltd at the company headquarters.

First aid provision for off-site activities includes training NCS team leaders and other Learn by Design employees, so they can administer a basic level of first aid. Where off-site venues have their own first aid provision, arrangements may be made to share that resource by agreement between the two organisations.

First aid equipment is issued according to the identified need, and designated employees have responsibility for ensuring first aid kit contents are complete and in-date.

7.13 Food hygiene (Food Safety Act 1990 and the Food Hygiene (England) Regulations 2006)

Learn by Design adheres to the BDG Ltd Food Hygiene Policy.

While food safety affects everyone the BDG Ltd and associated companies have taken the consideration that in connection to our direct activities, we will endeavor to ensure compliance of the Food and Safety Act 1990.

BDG will comply with the food hygiene procedures described in the Food Hygiene Policy.

7.14 Hazardous substances (Control of Substances Hazardous to Health Regulations 1992)

The risk assessment and storage of hazardous substances at company headquarters is the responsibility of the BDG. Where Learn by Design employees bring hazardous substances onto the premises, they will notify the Health and Safety Lead and / or office manager and comply with her instructions for use and storage.

7.15 Lone Working (Management of Health & Safety Regulations 1999)

The Health and Safety Executive defines lone workers as ‘those who work by themselves without close or direct supervision’. In our business we have identified the following lone working situations:

- Employees opening/closing the office.
- Employees working at the office during the evening or at the weekend.
- Employees working off-site.

BDG will comply with the risk management guidance described in the BDG Lone Working Policy.

7.16 Manual handling (Manual Handling Operations Regulations 1992)

Although every effort is made to reduce loads to a level where there is little risk of injury, we accept that this cannot always be achieved.

Specific manual handling risk assessments are undertaken by managers, supervisors, or seniors, with the assistance of the Health and Safety Lead “competent person” if required, to identify tasks which present a risk of injury and the precautions required to reduce the risk to the lowest level reasonably practicable. Recommendations arising from the assessments are implemented by managers, employees are instructed in the outcome and copies of the assessments are provided to all employees. Examples of this are the methods for lifting items of equipment such as the BATAK board, cycle ergometers and inflatable speed cage, all of which are assessed as 2 persons lift.

Manual handling awareness is achieved by an aide memoire for all staff and a requirement to familiarise themselves with [HSE guidance](#).

- Equipment is provided where possible to minimise or simplify handling of heavier objects, and we ensure that two persons are available where the risk assessment identifies the need. Safety footwear and suitable gloves will be supplied to employees who require it, and supervisors will monitor to ensure that it is used.
- When specifying protective clothing or uniform, the need to allow unrestricted movement for manual handling activities has been considered.
- Employees involved in significant lifting will be trained in the safe techniques to use and instructed to report to their line manager any health concerns that may make manual handling less safe for them.
- The significant findings of the assessments are communicated to staff involved in relevant activities.
- Where we have specified the use of equipment or safe systems of work to reduce manual handling risks, staff are trained in the system of work.

New and expectant mothers, those with health conditions which place them at additional injury risk, and workers below the age of 18, are generally prohibited from carrying out manual handling activities. Where an individual in these categories has duties, which would ordinarily involve manual handling, their supervisor is responsible for ensuring that they are not permitted to continue with these duties until the risks have been assessed.

For staff who are not expected to carry out significant lifting and therefore do not receive detailed manual handling training, we make it clear during induction training that they are not permitted to undertake these types of activities.

Records of manual handling assessments are retained for at least 5 years.

7.17 New and Expectant Mothers (Management of Health & Safety at Work Regs 1999)

BDG risk assessments have identified that some activities involve risks to new or expectant mothers at work.

If an employee notifies us that she is pregnant, and on return to work following birth, BDG undertake a specific risk assessment of her work considering HSE guidance and any information which the employee has provided. For employees involved in anything other than low risk office work, this risk assessment is undertaken with input from

our Health and Safety Lead “competent person” or an occupational health practitioner. Recommendations arising from the assessment are implemented promptly and the assessment is reviewed every 3 months. BDG will provide rest facilities for new and expectant mothers.

7.18 Noise (Control of Noise at Work Regulations 2005)

The Company recognize and acknowledges the requirements of the relevant legislation relating to noise and whilst this is unlikely to be a significant part of our work, we will take all reasonable steps to prevent excessive noise from affecting both our staff and others nearby.

7.19 Occupational health and health surveillance (Equality Act 2010)

BDG recognize our duty under the Equality Act 2010 and our duty to protect employees from harm to their health. For the purpose of meeting these responsibilities BDG may if appropriate use health screening to identify any medical conditions which may impact upon an individual’s capacity to perform their work role safely.

If an individual has an injury or illness which appears to be work related, affects their work, or is made worse by work, BDG may seek a medical opinion to assist us in evaluating the problem and identifying any practical changes BDG can make to assist the individual in safely continuing to do their job.

BDG have considered the need to provide ongoing health surveillance to employees and the BDG have determined that no health surveillance is required at this time.

Occupational health records are retained confidentially for 40 years.

7.20 Personal Protective Equipment (Personal Protective Equipment Regulations 1992)

The BDG recognize that the use of PPE as a risk control measure is a last resort as it protects only the user and is at risk of not being worn correctly. BDG employees are supplied, free of charge, with any PPE identified as a required risk control measure within risk assessments. We ensure that it is:

- Suitable:
 - It reduces the identified risk as intended.
 - It is CE marked.
 - Is a good fit.
 - Is suitable for the individual using it.
 - Is compatible with other PPE.
 - That suitable storage is provided to prevent damage.
 - Instructions are provided in its correct inspection, use, cleaning, storage, and maintenance.

Employees who are required to use or wear PPE are provided with training on:

- The circumstances in which it is used.
- The hazards against which it will give protection.
- The importance of correct use.
- How to wear it to obtain the right protection.
- Any limitations of the equipment.

The training also includes how to:

- Inspect.
- Clean.
- Maintain.
- Store the equipment.

- How to report defects and obtain replacements.

If issued PPE is checked periodically by supervisors and replacements are available on request in between inspections.

7.21 Safeguarding (The Children Act 1989, The Protection of Children Act 1999)

Safeguarding has been identified as a significant responsibility for Learn by Design Ltd, and the Company complies fully with the comprehensive guidance in the BDG Safeguarding Policy.

The Safeguarding Policy is regularly updated to reflect statutory and non-statutory guidance on safeguarding including the government's "Working together to safeguard children" [publication](#).

Safeguarding is considered as a part of all Learn by Design health and safety risk assessments.

The company also complies with the associated guidance in the BDG DBS Security Policy.

7.22 Slips, Trips and Falls (Health & Safety at Work etc. Act 1974)

BDG has responsibility for maintaining the company headquarters site at 49 Kepler, Tamworth and manages site slips, trips, and falls risks.

The prevention of slip and trip accidents in the workplace relies on the involvement of all staff and everyone is encouraged to deal with hazards when noticed.

- Staff are instructed in the importance of storing equipment in designated locations and keeping walkways free from obstructions and trailing cables.
- They are also encouraged to report hazards, seeking assistance with any which they cannot personally resolve.
- An aide memoire on slips, trips and falls is available to employees to raise their awareness of hazards and their responsibilities. This is also issued to seasonal employees as part of their induction training.
- We ensure that storage areas are of sufficient capacity, are well managed and are under the control of an identified person.
- Steps and stairs are equipped with handrails.
- Step edges are kept in good condition. External step edges are highlighted with yellow paint where necessary for visibility.
- Cleaning regimes are designed to ensure that dust, grease, and other slip hazards are well controlled. If there is a spillage, staff are responsible for ensuring that it is cleaned up promptly and any wet floor is clearly highlighted.
- Wet floor signs are used where floors remain wet after cleaning or because of other causes such as wet weather. However, floors which people are expected to use whilst wet, will be dried so far as is reasonably practicable.
- Cleaning staff also remove waste daily to ensure that it does not accumulate and cause a trip hazard.
- Staff are encouraged to wear footwear appropriate to their work activities.
- Suitable and sufficient lighting is provided for normal tasks, and emergency lighting is provided to aid escape in case of lighting failure.
- Arrangements are in place for dealing with ice, snow, and the accumulation of leaves on a timely basis to reduce the slipping risk in our external areas.

7.23 Smoking (Smoke-free (Premises and Enforcement) Regulations 2006)

Smoking is not permitted within our building and company vehicles. Signs are displayed at entrances and in vehicles in accordance with statutory requirements. Smoking is also not permitted in any private vehicle when used on company business if it is being used to carry passengers.

All staff and sub-contractors are prohibited from smoking within any customer premises or within any place where “no smoking” signs are displayed.

Smoking restrictions apply to both tobacco products and “e-cigarettes”.

7.24 Stress (Management of Health & Safety at Work Regulations 1999)

Stress is defined as ‘the adverse reaction people have to excessive pressure or other types of demand placed on them’. The BDG recognize that workplace stress is a health and safety issue and acknowledge the importance of identifying and reducing workplace stress.

The BDG encourage a supportive culture where colleagues assist each other to ease peaks in workload. The nature of our work demands regular communication between managers and staff and plenty of opportunities for staff to share problems and seek additional support if needed. The company discourages staff from working excessive working hours.

We offer support through:

- Managers.
- HR function.
- And where necessary professional life coaches and counsellors, where individuals experience excessively stressful situations or stress related ill health.

We intend that all staff will be properly resourced and trained to undertake their role. Our thorough selection processes assist us in matching individuals to the demands of each job function. Through ongoing management reviews, new starter induction procedures and annual staff appraisals, BDG identify and manage training and development needs. The BDG believe in offering developmental opportunities to staff where possible and where the member of staff desires it.

Management and supervisory staff receive training in good staff management practices. If the business is intending to implement organisational or procedural changes, the BDG ensure that managers communicate and consult with staff at an early stage.

Poor performance and attendance are actively managed to identify causes and solutions, including providing additional training or moving individuals to more suitable roles where necessary and possible. This approach also reduces the burden on other staff who would otherwise have an additional workload.

Bullying, harassment and discrimination are not tolerated, and the company complies with the relevant BDG Policies:

- Disability Discrimination
- Gender Equality & Equal Opportunities
- Trans Equality
- Grievance & Disciplinary
- Staff Training & Development.
- Whistleblowing

7.25 Visitors (Health and Safety at Work etc. Act 1974)

Visitors to BDG premises include clients, couriers, salespersons, contractors, and members of the public.

Visitors are asked to sign in and out of BDG premises and will be supervised by staff where necessary. Contractors undertaking work within BDG premises will be subject to BDG contractor control arrangements.

7.26 Vulnerable Adults (Mental Capacity Act 2005, Care Act 2014, Safeguarding Vulnerable Groups Act 2008)

Learn by Design Ltd observes the guidance in the OPG (Office of the Public Guardian) "[Safeguarding Policy](#)" November 2015 relating to vulnerable adults when business activities are related to that sector. The BDG also bases its approach on the Department of Health "[Statement of Government Policy on Adult Safeguarding](#)" May 2011.

Where Learn by Design activities involve vulnerable adults, the relevant health and safety risk assessments will consider risks specific to that group and ensure that appropriate control measures are in place before the activity commences. Where necessary an individual risk assessment may be required depending on the nature of the activity and the needs of the adult.

7.27 Welfare (Workplace (Health, Safety and Welfare) Regulations 1992)

BDG Ltd are responsible for the provision of adequate welfare facilities at the company headquarters office at 49 Kepler, Tamworth.

The BDG have evaluated the welfare facilities required for BDG business to comply with the *Workplace (Health, Safety and Welfare) Regulations 1992* and have confirmed that the existing facilities meet or exceed the minimum requirements.

- Well-equipped sanitary and washing facilities are provided in sufficient numbers for the staff using them.
- Facilities are also provided for staff to obtain drinking water, for heating water and heating food.
- All the welfare facilities are ventilated, well-lit and designed to be easily cleaned.
- A cleaning regime is in place.

Whilst working off-site, every effort is made to ensure that suitable welfare facilities are available to employees - where this is not the case, then a risk assessment will be made to look at alternative welfare provision.

7.28 Work at Height (Work at Height Regulations 2005)

Whilst the BDG aim to avoid work at height we have identified the following situations where our staff may be at risk of falling from a height e.g., accessing high shelving, and during social action projects.

All staff, including seasonal employees, are provided with an aide-memoire on work at height, and are instructed to avoid work at height wherever possible. They are also informed that where work at height may be undertaken by those within their care, such as NCS participants, a full risk assessment must be made prior to the activity taking place.

Where work at height is required, BDG conduct a risk assessment to identify the risk control measures required to minimise the risks so far as reasonably practicable.

The BDG will only use ladders and step ladders for work at height where the low risk and short duration makes this acceptable and where the nature of the work enables three points of contact to be maintained throughout.

Where work involves difficult access or work at heights which cannot be carried out safely from ladders or steps, special access arrangements will be put in place with specialist competent contractors.

All ladders and stepladders used by BDG employees meet BSEN131 standards. All work at height equipment including kick stools, step ladders and ladders, are subject to formal annual *inspections* in addition to pre-use inspection by the employee.

Our employees are instructed in the principles of safe use of the access equipment provided.

7.29 Work equipment (Provision and Use of Work Equipment Regulations 1998)

When selecting work equipment for purchase the BDG consider its suitability for the tasks required. The BDG also ensure through training that staff who are to use the equipment understand how to use it safely and the limitations of the equipment.

Where BDG purchase machinery or equipment from outside of the EU, the BDG recognize that we may become the importer and are consequently responsible for ensuring that the equipment meets conformity requirements as set out within Regulation 10 of the Provision and Use of Work Equipment Regulations and relevant CE Marking and EC Directive requirements.

Portable electrical equipment is subject to portable appliance testing by a complaint trained PAT testing technician. The frequency of testing is scheduled in accordance with IET and [HSE guidance](#) and this testing is in addition to the pre-use inspections that all staff are instructed to carry out.

Defects are reported to supervisors who ensure that repair or replacement is undertaken promptly. Equipment which is in a dangerous condition is securely removed from service while awaiting repair or disposal.

All powered equipment is capable of being isolated and procedures require that maintenance and cleaning be carried out with the equipment switched off, and where the risk assessment requires it, physically locked off or disconnected.

It is the BDG policy that staff are not permitted to use their own tools for work purposes, as this could make it very difficult for us to ensure that the equipment is suitable and properly maintained.

All work equipment is subject to a programme of inspection and where necessary, maintenance. This programme is devised considering the risk assessment, general good practice, and the manufacturer's instructions. Maintenance is only carried out by persons who have been suitably trained. The BDG have a programme of electrical inspection and testing for fixed electrical equipment.

Suitable storage arrangements are provided for work equipment including arrangements for safe carriage in our vehicles.

Where the BDG need to hire equipment on a long-term basis, we ensure that the maintenance and repair responsibilities are clearly agreed between ourselves and the hire company.

7.30 Young Persons (Management of Health and Safety at Work Regulations 1999)

Recognizing and managing the health and safety risks specific to young people is a significant and important element of Learn by Design business activity.

The BDG do not permanently employ persons under the age of 18.

Where young people are involved in work activities organised by Learn by Design the BDG ensure that Learn by Design comply with applicable employment and working hours' legislation including additional rest breaks and the length of working days. The BDG also undertake a specific risk assessment of the tasks which the young person is to be undertaking which considers their immaturity, inexperience, and lack of risk awareness. The individual is provided with additional instruction and supervision as determined by the risk assessment.

There are certain tasks which we do not allow young workers to carry out. Employees are provided with an aide-memoire which covers the requirements of assessing health and safety risks to young people.