



MKC Training Services Limited
at The Royal School of Military Engineering

**OCCUPATIONAL HEALTH & SAFETY
POLICY AND RESPONSIBILITIES**

Version	7
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Title	Occupational Health & Safety Policy			Ref. No	POL02
Approved by	SLT	Date	23/01/2019	Issue	10

General statement

Overall responsibility for Occupational Health & Safety (OH&S) within MKC Training Services Ltd. (MKCTS) is vested in me by virtue of my appointment as Managing Director. We are committed to excellence in all aspects of our activity; this includes ensuring the health & safety of everyone who comes into contact with our activities. The purpose of this statement is to ensure that MKCTS meets the requirements of the Station Commander’s OH&S Policy statement. The successful implementation of this policy requires total commitment from everyone throughout the organisation; we must all aim to improve our OH&S performance continuously through:

'Staying safe' by always doing the right thing... even if no-one is looking!

Our commitment

We fully commit to:

- Providing safe, healthy working conditions for the prevention of work-related injury and ill health
- Determining applicable OH&S legal and other compliance obligations, ensuring operations are completed in accordance with them and evaluating how effectively we satisfy these requirements
- Establishing, implementing and maintaining processes for the elimination of hazards and reduction of OH&S risks
- Continually improving our OH&S management system
- Consulting with, and securing the participation of our employees and employees’ representatives through our OH&S activities

We will achieve our commitments by:

Implementing and maintaining an OH&S management system that follows the principles of ISO 45001:2018 and is fully integrated within our overall SHEQ Management System	Proactively and systematically identifying and controlling risk through suitable and sufficient risk assessments and safe systems of work	Consistently and thoroughly investigating incidents and applying prompt corrective and preventative actions to reduce the likelihood of recurrence
Enhancing employees’, trainees’ and apprentices’ OH&S knowledge, skills and behaviours through effective information, training and supervision	Retaining a Health and Safety Manager and allocating suitable and sufficient resources to achieve the aims and objectives of our SHEF Action Plan	Engaging with our business stakeholders, employers and contractors to improve OH&S performance across the RSME and wider training and apprenticeship delivery

Responsibilities


All personnel, including staff, trainees, apprentices, visitors and contractors are required to comply with the Station Commander’s OH&S Policy statement and all other applicable compliance obligations and campaigns. All personnel are required to act responsibly, do everything possible to ensure the safety of themselves and others and to report to their immediate supervisor or other appropriate person any incident, practice or occurrence that constitutes a potential OH&S hazard.

Andrew Brader – Managing Director



Date: 23 Jan 2019

Reviewed by									
Date									

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1. OSH Organisation and Responsibilities

1.1. The Managing Director

The Managing Director has overall responsibility to the Board of Directors for ensuring through the line managers, the implementation of the Company's Health and Safety Policy. This responsibility will extend to the effectiveness of the organization and arrangements described in the appropriate sections of the company's health and safety documents.

1.2. The Health and Safety Manager (HSM)


The Health and Safety Manager has been given delegated responsibility by the Managing Director for advising on all health and safety matters and for ensuring the implementation of the Company Health and Safety Policy.

The HSM will:

- Review and revise the Policy as necessary.
- Chair the Company's Health and Safety Committee.
- Monitor changes in OHS and environmental legislation, update Compliance Obligations (IM09) accordingly and communicate new requirements to relevant personnel.
- Be the 'Responsible Person' as defined in RIDDOR.
- Monitor and review the effectiveness of the company's H&S arrangements.
- Provide advice and guidance for Divisional and Local H&S Managers.
- Ensure that statutory notices e.g. ELCI and Health and Safety Law poster are displayed in workplaces.

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- Provide relevant Health and Safety training and monitor the OH&S training requirements across MKCTS; updating the Training Needs Analysis (TNA) record as necessary.
- Arrange health surveillance (in collaboration with HR) where appropriate for employees.
- Coordinate inspections, both internal and external.
- Provide information and guidance to managers of programme areas.
- Provide a reporting chain to inform Divisional Managers of accidents, incidents, reports and inspections.
- Monitor compliance with the weekly testing of the fire alarm systems in each building.
- Shall arrange for regular tests of emergency procedures, including fire drills and evacuations.
- Develop and communicate the need for regular toolbox health & safety talks to employees and trainees.

1.3. Divisional Managers

Divisional Managers are designated Divisional Health and Safety Managers and have an overarching responsibility for all health and safety matters within their Division and at any other centre where staff and trainees are based.

The Divisional Manager's responsibilities will include:

- Carrying out a minimum of four divisional safety inspections annually of the areas under their control.
 - Pursuing the objectives of the company in respect of health and safety and to monitor their implementation.
- 1.3.1. In particular, ensuring the implementation of the company's policy and that all members of staff are aware of its contents.
 - 1.3.2. To be available to any member of staff to discuss and to seek to resolve health and safety problems not solved at a lower level.
 - 1.3.3. Ensuring that line managers report to the company Health and Safety Manager those instances where action has been taken to reduce to a satisfactory level or remove any hazard, and any short term measures necessary to maintain safety pending rectification which has involved the direct involvement of the Divisional Manager.
 - 1.3.4. Ensuring that divisional activities for which they are responsible are subject to health and safety inspections on a planned, regular basis by line managers.
 - 1.3.5. The Divisional Manager may nominate one or more line managers to act as Local Health and Safety Managers. The role of a Local Health and Safety Manager is described below and can only be ***in respect of that person's normal area of responsibility***.
 - 1.3.6. A nominated Local Health and Safety Manager will act as Deputy in the event of the Divisional Health and Safety Manager's absence. This person will also act as the investigation officer in the event of an accident or incident in their programme area.

1.4. Local Health and Safety Managers

- 1.4.1. The **Facilities Manager** is responsible for advising on health and safety matters relating to buildings, building services and their staff.

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- 1.4.2 The Facilities Manager has a responsibility to ensure the safe system of work managed by Babcock is adhered to and that external contractors do not prejudice the health and safety of staff, trainees and visitors.
- 1.4.3 The Facilities Manager is also responsible for ensuring that arrangements are made for the maintenance and statutory inspection of lifts, pressure systems, fire alarms, lifting gear and any other statutory testing requirements.
- 1.4.4 The Facilities Manager will ensure that all electrical systems and electrical equipment, which is outside the PAT regulations, complies with statutory requirements, is tested and maintained in safe working order.
- 1.4.5. **Faculty Managers** (or equivalent) are designated Local Health and Safety Managers and are responsible to their Divisional Manager for all day to day health and safety matters affecting staff and trainees within their faculty.
- 1.4.6. The **Faculty Manager** (or equivalent) has overarching responsibility to ensure health and safety compliance within their areas of responsibility. Faculty Managers are to carry out a minimum of one programme area safety inspection on a daily basis
- 1.4.7. Faculty Managers can disseminate areas of responsibility but not accountability to Programme Area Leaders.
- 1.4.8. **Programme Area Leaders (PALs)** (or equivalent) are designated Local Health and Safety Managers and are responsible to the Faculty Manager for all day to day health and safety matters affecting staff, trainees and visitors within their programme area.
- 1.4.9 **Programme Area Leaders (PALs)** (or equivalent) are to carry out a minimum of two programme area safety inspections on a daily basis.
- 1.4.10 **PALs** (or equivalent) are to ensure the following safety action points are carried out:
- Ensuring the prevention of accidents and the avoidance of ill health arising from work activities.
 - Taking steps, so far as is reasonably practicable, to remove or reduce hazards.
 - Reporting to the Company Health and Safety Manager instances where their normal executive authority does not allow them to deal effectively with a hazard, or if there is any doubt as to the practicability of a solution.
 - Where necessary take appropriate short-term measures to maintain safety pending rectification.
 - Ensuring that accidents are reported in accordance with Holdfast's instructions and, when so directed by the Company Health and Safety Manager or their nominated deputy, establish the facts of any accident or incident.
 - Conduct monthly inspections of their designated areas, from the viewpoint of identifying hazards, assessing the effectiveness of hazard reduction systems and other arrangements.
 - To ensure that codes of practice, risk assessments, COSHH assessments and SSoW are prepared as appropriate to their area of activity.
 - To ensure that Fire wardens are completing their daily and weekly tasks
 - Taking all reasonable steps to ensure that staff are informed of the content of any information relating to their health and safety which is issued from time to time,

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including H&S Procedures, COSHH Assessments, Risk Assessments SSoW and Codes of Practice.

- Ensuring the use of protective clothing and equipment, where appropriate, and that such clothing and equipment is properly maintained and renewed when necessary.
- Ensure staff attend appropriate health surveillance sessions where a risk assessment shows it to be necessary.
- Ensuring that employees, visitors or contractors new to a workplace are given every assistance to perform their duties in a safe manner; in particular, ensure that they are given time to familiarise themselves with the Health and Safety Policy documents, procedures and guidance and sign as understood prior to starting work.
- Ensuring that new equipment is tested in accordance with current standards and placed on the maintenance register, in addition periodic inspections are to be conducted to ensure portable electrical appliances are regularly tested and registered with the maintenance department.
- Taking advice from the Facilities Manager and/or the company Health and safety Manager on any area of health and safety where they themselves do not have specific specialist knowledge.
- Ensuring that practical arrangements are in place to enable areas to be cleared in the event of an emergency evacuation or drill.

1.4.11 Tool Box Talks are to be delivered as deemed necessary and at the Health and Safety Manager's request. **All line managers** are to ensure that:

- Toolbox talks are delivered to all their staff on a periodic basis.
- All those who attended the toolbox talk complete the record of attendance (HSF014).
- A copy of the above record of attendance is maintained

1.5. Safety Representatives

1.5.1 Functions of Safety Representative

The regulations provide that safety representatives shall have the following functions:

- To investigate potential hazards and dangerous occurrences at the workplace (whether or not they are drawn to his/her attention by the employees represented) and to examine the causes of accidents.
- To investigate complaints by any employee he/she represents relating to that employee's health, safety or welfare at work.
- To make representations to the employer on matters arising out of the two bullet points above.
- To make representations to the employer on general matters affecting the health, safety or welfare at work of the employees at the workplace.
- To carry out inspections in accordance with the Regulations.
- To represent the employees he/she was appointed to represent in consultations at the workplace with Inspectors of the HSE and of any other enforcing authority.

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- To receive information from inspectors in accordance with the Act.
- To attend meetings of safety committees where he/she attends in his/her capacity as a safety representative in connection with any of the above functions.

1.5.2 Notification of Safety Representative Appointments

Recognized trade unions will notify the Company Health and Safety Manager of the details of safety representative appointments and a record of all safety representatives will be maintained centrally. Divisional Health and Safety Managers will be informed of relevant appointments.

1.5.3 Safety Representatives – Communications

Safety representatives should establish links with line management within a division and should channel all communications through the Divisional Health and Safety Manager (excepting those with their own trade union.)

1.5.4 Time Off and Facilities for Safety Representatives

The company recognizes its responsibility to grant necessary paid time off to ensure safety representatives can carry out the functions specified in 1.5.2. It will also grant statutory time off with pay to enable them to receive training. Agreed interim working arrangements between safety representatives and Company Health and Safety Managers are to be developed.

1.6 Company Health and Safety Committee

Representatives from the company Management including the Health and Safety Manager and Trade Unions will be appointed to the Company Health and Safety Committee.

Two committees will convene at set periods throughout the year;


Execs H&S meeting will occur twice a year and a faculty managers committee will meet quarterly each year.

The terms of reference for the Company Health and Safety Committee are as follows:

- To keep under review the measures taken to ensure the health, safety and welfare of the company community.
- To refer appropriate matters for action to the senior management team.
- To ensure that information on health and safety matters is effectively and appropriately distributed to staff.
- To consider effective means of health and safety training for company staff.
- To receive reports and recommendations from Divisional Health and Safety Committees.
- To receive reports and recommendations from statutory inspectors and other authorized officers on matters affecting the company and to take appropriate action.

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1.7. Provision of Information

- 1.7.1 The Company Health and Safety Manager is the primary source of circulating relevant information to the Divisional and Local Health and Safety Managers reflecting the Company policy and changes in legislation.
- 1.7.2 Request for information on the company's health and safety arrangements from external sources should also be directed to the Company Health & Safety Manager.
- These can come from a variety of organizations such as: - the Skills Funding Agency, the HSE, Awarding Organisations and Training Providers.
- 1.7.3 The Company Policy and Procedures will be made available on g-two / SharePoint and in hard copy.
- 1.7.4 As part of the induction process, staff are to sign to confirm they have read and understand the company's key policies and guidance. Changes to policy and processes are communicated to existing staff via HTS LAN email bulletins.

1.8. Occupational Health

The company Occupational Health Policy aims to promote, maintain and protect the health and well-being of all employees by providing expert professional advice to employees on health issues that affect wellbeing and performance at work. This includes looking at how the health of an employee can affect their fitness for work and how their work can impact on their health.

The focus is on identifying and responding to health issues as early as possible, to support a healthy working environment for all.

1.9. Breaches of the Health and Safety at Work Act 1974

Breaches of this Act are a criminal offence. In the event of prosecution the onus for proving that something was not reasonably practicable in the circumstances is placed on the defence.

Failure to comply with Approved Codes of Practice issued under the Act raises a presumption that a related safety requirement was not complied with.

The Board of Directors, Managing Director, employees, suppliers of goods and services and (so far as section 8 is concerned) members of the public are all subject to the Act.


2. Duties & Responsibilities of Employees

2.1 Overall Duties & Responsibilities for Safety

- 2.1.1 The purpose of the following is to ensure that all employees with no specific management responsibilities are aware of the necessary steps to be taken to discharge both their own responsibilities and the duties of the organisation as required by the Health and Safety at Work Act 1974 and management regulations.
- 2.1.2 Section 7 of the Health and Safety at Work Act 1974 places a duty on all employees while at work to take reasonable care of themselves and of anyone who may be affected by their acts

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or omissions. They also have a duty to co-operate with the company in order that it can comply with its own duties under the Act and associated legislation.

2.1.3. Section 8 requires that no one shall interfere with or misuse anything provided by the company in the interests of health and safety (e.g. fire alarms, extinguishers, first aid boxes, machine guards). NB This section applies not only to staff, but also to trainees and visitors whilst within any of the Company's facilities.

2.2. Instructional Staff Responsibilities for Safety

Instructional staff are directly responsible to their Local Health and Safety Manager in matters of health and safety. They have a duty to take reasonable care for the health and safety of themselves, other staff, trainees and visitors who may be affected by their teaching and other work related activities. They must ensure that:

- Safe systems of work are taught at all times.
- Sufficient information, instruction and training is given to trainees to enable them to work safely.
- Plant, equipment and substances are used in a manner which will not adversely affect their health and safety and that of trainees or other staff.
- Assist the company in meeting statutory requirements.
- They are competent to teach the given subject.
- Safe working environments are maintained at all times.
- Comply with PPE assessments.

2.3. Maintenance Support Staff Responsibilities for Safety

Maintenance support staff are directly responsible to their local Health and Safety Managers in matters of health and safety. They have a duty to take reasonable care for the health and safety of themselves, other staff, trainees and visitors who may be affected by their work related activities.

The **Maintenance Manager** has an overarching responsibility for all health and safety matters within the division.

The **Maintenance Manager** is responsible for ensuring that the maintenance support staff under their control maintain and/or provide:

- Safe working conditions in workshops and programme areas.
- Risk assessments are undertaken for all activities.
- Plant, equipment and substances in a manner which will not adversely affect their health and safety and that of trainees or other staff, when work and maintenance is undertaken.
- Co-operate with the company in meeting their statutory requirements.

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