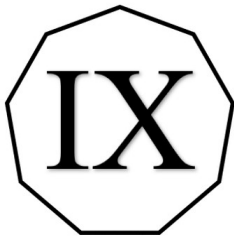


NiNe Training Limited

Occupational Health and Safety policy

Polisi Iechyd a Diogelwch Galwedigaethol



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### Appendices:

If you or someone you know would like this document in an alternative format, please contact the Company.

[info@nine-traininglimited.com](mailto:info@nine-traininglimited.com)



## Context

1.1 The Health and Safety at Work Act 1974 provides the legislative framework to promote and encourage high standards of health and safety at work. The Act requires every organisation employing five or more people to document its health and safety policy.

1.2 The policy is to ensure a safe and healthy environment for all persons employed, studying or visiting their sites and this policy aims to meet the requirements of all statutory and corporate expectations.

1.3 To achieve this, NiNe Training is committed to the belief that:

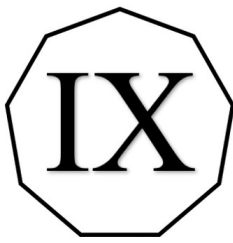
- The only effective approach to the prevention of ill health, injury and loss is one based on the systematic identification and control of risks.
- The full participation of all individuals within The Company is vital to successful safety management.
- Managing health and safety can contribute to the overall performance of all The Companies undertakings.
- Progress is achieved by reviewing safety performance so as to learn from experience.

1.4 The way forward is to develop an appropriate organisational structure and positive safety culture to support risk control methods.

1.5 If any member of staff requires assistance with understanding or implementing this policy, particularly where the reasons for this are related to disability, religion or belief, sex, gender reassignment, sexual orientation, pregnancy or maternity, marriage or civil partnership, age or race they should contact the Management.

## 2. Status

2.1 This policy was presented to the Management Team on 1<sup>st</sup> November 2023 before cascading to the Health and Safety officer.



### 3. Policy

#### 3.1 Health and Safety Policy statement

NiNe Training Limited recognises that it has a responsibility as an employer to ensure the "Health, Safety and Welfare" of all employees whilst at work. Additionally, it is the responsibility of all persons who work for this organisation (Directors, Managers, Employees, etc.) to ensure this policy extends to all other persons who may be affected by our work activities.

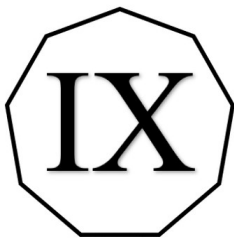
Responsibility for the overall implementation, maintenance and development of our safety management system, however, rests with the Edward Neil Hammett, including the regular setting and reviewing of objectives, and the provision of adequate resources to allow those objectives to be achieved.

It is also the responsibility of the Edward Neil Hammett within NiNe Training Limited to ensure that our health and safety policy conforms to all applicable legislation.

Management recognises the importance of its staff and encourages the reporting of any hazard or risk that may adversely affect our health and safety. We also recognise the importance of ensuring that staff are adequately trained, informed, and supervised to fulfil their activities in a safe manner.

NiNe Training Limited is committed to a management system that demonstrates a pro-active approach through the continual improvement of our health and safety performance. This is further achieved by the regular setting and reviewing of objectives to achieve compliance to current safety legislation and other requirements applicable to our organisation, and through matching our industry's best practices.

We, as an organisation, also recognise the need for the identification of hazards and the recording and reviewing of risk assessments and see that the only effective approach to the prevention of ill health, injury and loss is one based on the systematic identification and control of risks.



#### 4. Planning

4.1 In ensuring that sufficient resources are made available for the safety system to be fully effective, it is the aim of the organisation to first identify the extent of the risks that are posed by routine and non-routine activities undertaken as part of our own work processes. The basis for identifying these risks within NiNe Training Limited is the process of hazard identification, risk assessment and risk control.

4.2 Reviews of the risk assessment/risk control process will be completed on an annual basis unless there is change in equipment, procedures, chemicals, processes, working environment or to the people operating in the area which demand that an interim or new assessment be completed.

4.3 The results of all risk assessments will be entered onto the relevant risk assessment forms and any remedial actions highlighted as part of the assessment are entered onto an objectives plan; this plan will then form part of NiNe Training Limited ongoing commitment to the setting and reviewing of occupational health and safety objectives.

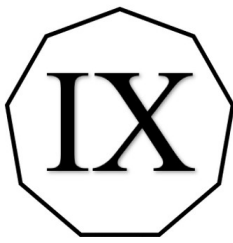
#### 4.4 Legal and other requirements

4.4.1 Many of the procedures and operations used within NiNe Training Limited that are included in our risk assessment process have relevant Acts, Statutory Instruments, Approved Codes of Practice and guidance published by external bodies that will assist NiNe Training Limited in complying with health and safety legislation.

#### 4.5 Objectives

4.5.1 NiNe Training Limited health and safety management system allows for two levels of objectives:

- i: System objectives - Resulting from the management review of the health and safety system.
- ii: Re-active objectives - Resulting from Risk Assessments, Accident investigations, Audits etc.



## 5. Implementation and Operation

### 5.1 Structure and Responsibilities

5.1.1 Notwithstanding the fact that all members of staff within NINE have a responsibility for their own safety and the safety of others, specific responsibilities have been assigned to designated personnel within NINE. This allows us to ensure that the health and safety management system operates in an effective manner. However, specific responsibilities and authorities may be contained within various procedures in the health and safety manual, the main system responsibilities have been assigned as follows: -

### 5.2 The Directors

- Has overall responsibility for ensuring that the Health and Safety Plan is formulated and reviewed annually.
- Appoints a Management Representative to implement the management system in line with the Policy.
- Reviews on a regular basis health and safety performance
- Approves NiNe Training Limited Health and Safety Policy and appoints a Management Representative to implement the management system in line with the policy.

### 5.3 Management Appointed

- Is the person delegated from the Directors as the Management Representative for overseeing health and safety?
- Has responsibility for ensuring that the health and safety plan is formulated, reviewed annually and provided with sufficient resources in terms of financial, human, time and materials to ensure that it can succeed?
- Will ensure that the requirements of the Health and Safety Management system are communicated to and understood by the organisations management.

### 5.4 Director(s)

Is the person responsible for:

- Monitoring and reporting of the overall Health and Safety performance



and conformance with system requirements and standards.

- Has overall responsibility for ensuring that the organisation is operating in compliance with all legislative requirements and the requirements of the Health and Safety Management system.
- Co-ordinate development of the Health and Safety management system and monitor its implementation.
- Will ensure that the requirement of the Health and Safety Management system are communicated to and understood by the organisations management.

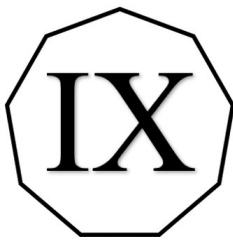
### 5.5 Management team

- Have responsibility for ensuring that the Health and Safety policy is implemented within their own areas of responsibility.
- Will ensure suitable arrangements are in place for the successful implementation of the policy within their area.

### 5.6 Ensuring that all staff under their control, know, understand and accept their health and safety responsibilities.

### 5.7 Directors

- Have responsibility for ensuring that the health and safety policy within their area is implemented.
- Will ensure that suitable arrangements are in place for the successful implementation of the policy.
- Are aware of the organisation's health and safety policy and will ensure compliance, implementation and monitoring of the health and safety system together with local arrangements in their area.
- Ensuring that all staff under their control, know, understand, and accept their health and safety responsibilities.
- Are accountable for the health and safety of all staff and students within their area and for others who may be affected by the work of the service.
- Allocate sufficient resource to ensure that health, safety and workplace welfare issues including matters arising are appropriately managed and resolved.
- Ensure that suitable and sufficient risk assessments are in place and control measures implemented.



### 5.8 HR Manager

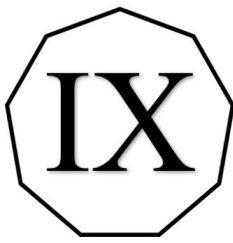
- Has specific responsibilities regarding the provision of an occupational health advisory service for the organisation and will ensure that:
- All new permanent employees undergo medical screening before they commence employment to determine if any reasonable adjustments are needed.
- A health screening and surveillance service is made available for all.
- After prolonged absences from work a "fit note" is required from the employees General Practitioner (throughout the period of absence, support is available).
- Advice and guidance are given on employee's medical status and suitability for job transfers (where necessary).
- General advice and guidance are made available to management on occupational health legislation.
- Availability of counselling service for employees.
- Providing general guidance to all employees regarding health and welfare issues.
- Fitness to Work Assessments by Occupational Health provider.
- Ill Health Retirement Referrals by Occupational Health provider.
- Absence Management and Management Referrals

### 5.9 Health, Safety and Environment Manager

- Is responsible for the development of NINE health and safety policy, procedures and management arrangements.
- Providing health and safety advice and support to members.
- Monitoring health and safety performance and analysis of incident statistics in order to advise of any trends or preventative measures required.
- Liaising with other internal or external health and safety specialists and regulatory bodies.

### 5.10 Employee Safety Representatives





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The role of "Safety Representatives" and their legal rights was established under the Health and Safety at Work Act 1974 and has been re-enforced in subsequent legislation. To summarise, these rights include:

- Consultation with management on any matters relating to health and safety.
- Inspection and copying of any document relevant to the workplace, which has a direct bearing on health and safety matters.
- Investigation of hazards, accidents and near misses.
- Determining the root causes of accidents.
- Making representations on general matters affecting the health, safety and welfare of employees.

### 5.10.1 Key functions of a Safety Representative are as follows:

- Attend meetings within their capacity as safety representatives (e.g. meetings arranged to address safety matters).
- Carry out safety inspections with the Head/Manager responsible for the area at timescales dictated or more frequently as circumstances dictate (e.g. such as the introduction of new machinery).
- Carryout, take part in and / or review risk assessments for their area.
- Investigation of accidents, near misses or hazards.
- Consult with the Health and Safety Executive Inspectors and be informed of any action they take or propose to take against the organisation.

## 5.11 Employees' Responsibilities

5.11.1 In accordance with NiNe Training Limited Health and Safety Policy, all employees including academic members of staff responsible for students have an individual responsibility and duty for:

- Making themselves familiar with and conform with NiNe Training Limited Health and Safety Policy at all times.
- Conforming to the safety rules and Safe Systems of Work Procedures at all times, including permit to work systems, inspection and testing etc.
- Wearing appropriate safety or protective equipment, personal footwear or clothing and using appropriate safety devices, as specified at all times.
- Making suggestions to improve health and safety in the organisation to



the management.

- Reporting without delay all risks or hazards, including defects to machinery, unsafe practices and near miss situations.
- Reporting without delay any injury suffered as the result of any accident during the course of their work to their immediate supervisor or First Aider as appropriate.
- Ensuring that good housekeeping is maintained at all times at their workplace and surrounding area.
- Taking reasonable care of themselves and other persons who may be affected by their actions whilst at work.

### 5.12 Learners

5.12.1 Students except those in the course of carrying out paid employment are not generally considered to be employees under health and safety legislation. However, all learners at NiNe Training Limited are expected to comply with the safety arrangements that are in place within the company and are legally obliged to take reasonable care for their health and safety and others that may be affected by their actions nor to misuse or damage equipment provided for their safety.

### 5.13 Training, Awareness and Competence

5.13.1 NiNe Training Limited recognises training as a key feature in its on-going programme to ensure an effective health and safety management system. Training provisions within NiNe Training Limited are divided into three main areas:

- Induction training: All new employees whether permanent or temporary will undergo the internal induction training which covers general health and safety issues and activities of specific importance to NiNe Training Limited
- Job/ Task specific: This is an internal or external program where specialist skills or knowledge is required to conduct a specific task or activity.
- Refresher: This is an internal or external program where additional training will be provided at specified intervals for updating personnel trained in specific tasks



5.13.2 As a means of ensuring that training needs are identified and that relevant training is sourced either internally or externally, it is the responsibility of the Manager to ensure the ongoing training needs of their areas of responsibility are completed in a timely manner.

### 5.14 Consultation and Communication

5.14.1 Effective internal communications are vital to establishing and maintaining a safe working environment. The organisation has in place a number of communication channels through which safety information is briefed or issues raised by employees. The key internal communication channels are:

- With an individual's Manager or Supervisor
- Safety meetings
- Company shared drive.
- Notice boards.

### 5.15 Documentation / Document control.

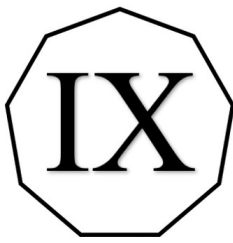
5.15.1 All documentation within NiNe Training Limited health and safety management system is the responsibility of the Health, Safety and Environment Manager. That person is responsible for retaining the "MASTER COPY" of the document and for ensuring that necessary copies are issued to employees, or any other interested parties as required.

### 5.16 Operational control

5.16.1 Procedures and safety working practices are retained in the health and safety manual have been produced to outline the operational and management controls of relevant activities within NiNe Training Limited, these may include: -

- Routine and non-routine activities or operations that may carry a significant risk.
- Activities/ Operations that may require the assistance of external agencies (e.g. contractors)
- Building monitoring and maintenance
- Equipment monitoring and maintenance.

5.16.2 Site safety rules have been drawn up to promote/ensure good safety practice. It is the duty of employees (including contractors and visitors working on behalf of the NN Training Services) to observe these rules and behave in a manner that is safe



and reasonable towards fellow employees, the organisation, visitors and students.

5.16.3 All employees are provided with an employee handbook which contains the general health and safety rules. They are required to read, understand and comply with the requirements set out in it.

5.16.4 In the majority of instances, the production of any procedures or safe working practice will normally follow the completion of a suitable and sufficient risk assessment.

### 5.17 Statutory Risk Assessments

5.17.1 Where specific statutory hazards must be assessed e.g. hazardous substances, asbestos, lifting equipment, electricity, noise, etc., the policy is as follows:

- Identify the hazardous substances present in the workplace.
- Assess the health risks from the substances.
- Prevent, reduce or control the risks by elimination, substitution or engineering controls.
- Decide what further precautions are required e.g. PPE.
- Monitor the control measures to ensure they are effective.
- Train and inform personnel.
- Review the assessments when necessary.

### 5.18 Emergency Preparedness and Response

5.18.1 Plans and procedures for fire incidents have been developed to address the potential emergency situations that could arise within NiNe Training Limited.

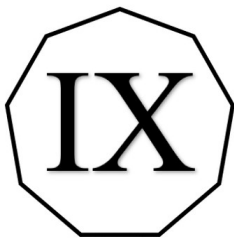
5.18.2 Site fire evacuation procedures for fire incidents are documented and cover emergency evacuation, means of escape and fire extinguishers.

5.18.3 Emergency evacuation drills will be conducted at least twice per year.

### 5.19 First Aid provision

5.19.1 The organisation has made arrangements to provide adequate facilities and equipment to enable first aid to be given to employees who are injured or become ill at work. The main arrangements are:

- There is a network of trained and qualified first aiders covering all areas.



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- The names of the first aiders are readily available on SharePoint (internal website)
- First aid equipment is available in all areas of the organisation.
- First Aiders must record all accidents incidents reported to them and any treatment given.
- The Staff Development the regular refresher training required for the First Aiders to maintain their qualifications.

### 6. Monitoring

6.1 The health and safety management system within the NiNe Training Limited allows for both pro- active and re-active monitoring.

6.1.1 Pro-active monitoring within NiNe Training Limited can be achieved by any of the following means:

- Risk Assessments
- Workplace Inspections
- Fire Inspections
- Periodic Statutory Inspections (i.e. Portable appliance testing, Fixed electrical, Fire equipment etc.)
- Compliance with the various Action Plans

6.1.2 Re-active monitoring is undertaken following serious accidents or incidents, reports of ill-health or property damage.

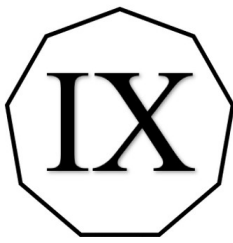
6.1.3 It is the responsibility of the Health, Safety and Environment Manager to review both aspects of monitoring on a quarterly basis.

### 6.2 Accidents, Incidents, Non-conformances and Corrective and Preventive Action

6.2.1 Procedures exist within NiNe Training Limited health and safety policy to ensure that any variations from its policies and any uncontrolled activities are investigated and where appropriate remedial actions are planned and implemented. The purpose of an investigation is to identify the root cause of an incident so that actions can be taken to prevent the event happening again.

6.2.2 Accidents, Incidents and Non-conformances within the organisation are divided into three main categories:

- I. Major Accidents / Incidents



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(These are always investigated and where appropriate reported to the enforcing authorities)

### II. Minor Accidents / Incidents

(These are only investigated when sufficiently serious to warrant investigation)

### III. Substantial variations to working practices resulting in dangerous occurrences arising.

(These are always investigated)

6.2.3 In general, the level of investigation should be decided according to the potential risk or harm of an incident and not just by the actual harm or damage suffered. In some cases, the investigation into a minor accident / incident could be more detailed than an investigation into a major accident / incident.

## 6.3 Corrective and Preventative Action

6.3.1 The need for corrective action is identified from either an inspection report, accident/incident reports or internal audits.

6.3.2 The need for preventative action is normally identified through the risk assessment process.

## 6.4 Audit

6.4.1 A Health and Safety Compliance report is taken to every meeting when it meets every academic term.

6.4.2 An annual Health and Safety report is also presented and usually held at its December meeting.

## 7. Monitoring

7.1 The policy is to be monitored by the Health, Safety and Environment Manager - Edward Neil Hammett.

## 8. Review

8.1 It is the responsibility of the Directors to ensure that Health and Safety review meetings are conducted on a regular basis and that all key personnel attend.

8.2 The review meetings determine the successful implementation of the health and



## NiNe Training Limited

safety management system and is considered to be the main forum for the discussion of any system objectives. Items typically covered in the review meeting include the following:

- |                                    |           |
|------------------------------------|-----------|
| • Review of incidents              | Monthly   |
| • SHE Performance                  | Monthly   |
| • Items arising                    | Monthly   |
| • Participation and consultation - | Quarterly |
| • External communication           | Quarterly |
| • Legal compliance                 | Annually  |
| • Changes in legislation           | Annually  |
| • Changing circumstances -         | Annually  |

8.3 The policy will be reviewed annually.

8.4 The next date for review is June 2024.