



# Health and Safety Policy

2023/24



## **Health and Safety Policy**

I confirm that I have received, read and understand and agree to abide by the JTL Health and Safety Policy.

.....  
Signature

.....  
Date

.....  
Print Full Name

.....  
Team/Department

Please **return this page to the Human Resources Department** and retain the rest of this document for your information.

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## Part A – General Statement of Policy

### 1. The Health and Safety at Work etc. Act (HASAWA) 1974

The purpose of this document is to set out the Health and Safety Policy of JTL as required by Section 2(3) of the Health and Safety at Work etc. Act 1974.

### 2. General Policy

It is the policy of this company to give prime importance to the health and safety of its employees whilst at work, which includes the risks that arise from driving on company business. This is considered to be a management responsibility equal to that of any other function. In order to achieve and maintain the high standard required, both management and staff must be aware of, and accept, their respective responsibilities.

The company is committed to using best endeavours in promoting apprentice training in a safe, healthy and supportive environment within the scope of health and safety legislation, and by adopting and encouraging the industry to use methods of best practice.

JTL is committed to ensuring that consideration is given to vulnerable learners and that appropriate action is taken as necessary to ensure their health and safety.

The company will, through its organisational arrangements, ensure so far as is reasonably practicable the health, safety and welfare of its employees whilst at work and all persons likely to be affected by its operations, and in particular provide:

- a safe and healthy working environment and safe systems of work
- safe plant and equipment
- adequate information, instruction, training and supervision
- safe storage for all inherently dangerous materials and substances
- facilities for the treatment of any injuries that occur at work
- effective procedures for the evacuation of buildings or other areas in the event of fire, explosion or any other emergency
- a system to record all accidents and dangerous occurrences
- a system to monitor accidents and ill health in order to reduce the frequency and likelihood of these incidents occurring
- assurance that adequate facilities exist for effective consultation between management and employees on matters of health and safety
- the allocation of duties for safety matters and the particular arrangements that shall be used to implement the policy as set out in part C (page 8)
- an annual review of the policy's performance to ensure it is kept up-to-date, and reviewed when changes to legislation occur, or when an accident investigation identifies that a change in policy is required.

This Policy is implemented in conjunction with JTL's Driving at Work (JTL825), Equality and Diversity (JTL701), Bullying and Harassment (JTL727) and Safeguarding Young People (Children) and Vulnerable Adults (JTL730) Policies. The policy is reviewed and approved annually by JTL's Executive Management Team.

Date: 1 August 2023

Signed:



**Chris Claydon, Chief Executive**

## Part B – Health and Safety Organisation

### 1. Chief Executive

The Chief Executive will have overall and final responsibility for all matters pertaining to health and safety within the company.

### 2. Director of Finances and Resources

The Director of Finances and Resources has the following responsibilities and will ensure that:

- 2.1 adequate resources are available to fully meet company obligations
- 2.2 adequate employer's and public liability are in place and maintained annually
- 2.3 adequate insurance is maintained for all company vehicles
- 2.4 only company-approved vehicles are made available to members of staff supplied with a company car
- 2.5 routine maintenance of company vehicles is carried out in accordance with manufacturer's guideline
- 2.6 all electronic equipment supplied and provided to all staff is of a quality to ensure safety identified as such by appropriate CE or BS markings.

### 3. Human Resources Director

The Human Resources Director has the following responsibilities and will ensure that:

- 3.1 they maintain day-to-day responsibility for all matters pertaining to health and safety within the company
- 3.2 they liaise with the Head of Health and Safety on all matters of health and safety
- 3.3 all employees receive adequate training in health and safety
- 3.4 all staff receive the Health and Safety Policy upon commencement of work. In addition to the above, with regards to driving on company business, they will also ensure that:
- 3.5 all staff identified have a valid driving licence
- 3.6 routine checks are carried out to ensure that driving licences are valid
- 3.7 all staff identified have fully comprehensive insurance cover, inclusive of business use
- 3.8 routine checks are carried out to ensure insurance remains valid
- 3.9 routine checks of MoT certificates are carried out
- 3.10 Driving at Work policy is issued to all new members of staff who will be required to drive as part of their working routine on commencement of employment.

### 4. Head of Health and Safety

The Head of Health and Safety (CMIOSH) has the following responsibilities to:

- 4.1 act as Chairman of the Health and Safety Working Party
- 4.2 control the national co-ordination and implementation of JTL's Health and Safety Policy
- 4.3 advise the Directors on matters concerning health and safety management and its implementation
- 4.4 supervise the implementation of health and safety practices as required

- 4.5 provide advice on legislative requirements as necessary
- 4.6 supervise the health and safety inspections of all JTL offices and other premises under its control
- 4.7 ensure that a fire risk assessment is carried out at all JTL offices and other premises under its control
- 4.8 organise and co-ordinate accident reporting procedures and documentation
- 4.9 co-ordinate the conduct of accident investigations and to report the findings direct to the Directors
- 4.10 review periodically the organisational arrangements
- 4.11 provide such training and documentation as may be necessary from time to time in order to promote awareness of health and safety within the company
- 4.12 liaise with all staff on health and safety matters
- 4.13 appraise periodically the effectiveness of the policy and ensure that any necessary changes are made through the working party
- 4.14 co-ordinate the completion of documentation concerning staff induction in health and safety
- 4.15 report non-compliance with the policy to the Directors and Managers as appropriate.

## **5. Line Managers**

Line managers have the following responsibilities and must ensure that:

- 5.1 they are familiar with the requirements of the policy
- 5.2 the policy is communicated, understood and followed by all members of their team
- 5.3 team members are not placed in a position that leads to, or encourages, a breach of policy as a result of unrealistic workloads, schedules and targets
- 5.4 any issues raised regarding driving/travelling on company business are acted on appropriately
- 5.5 any breach of policy is reported to the Head of Health and Safety or a Director.

## **6. Health and Safety Officers**

The Health and Safety Officers have the following responsibilities and must ensure that:

- 6.1 accident investigations are carried out to meet both legal and contractual duties and, where necessary, recommending appropriate remedial measures encouraging employers to adopt methods of best practice
- 6.2 staff training in manual handling and display screen equipment is carried out on a regular basis
- 6.3 health and safety team audits are carried out and completed to an agreed schedule
- 6.4 the issue and use of suitable items of personal protective equipment is carried out
- 6.5 they assist the Head of Health and Safety as required in all areas of health and safety.

## **7. Health and Safety Working Party**

JTL sees communication between staff at all levels as an essential part of effective health and safety management. Consultation and communication will be facilitated by means of the Health and Safety Working Party, which meets on a regular basis.

The purpose of the working party is to provide a forum in which information may be conveyed and employees' questions on health and safety issues answered. These meetings will also provide an opportunity to assess the continuing effectiveness of the policy.

The working party reviews accident reports and statistics, carries out analysis of accidents to identify trends, takes proactive action to prevent recurrence by the recommendation of appropriate preventative measures, and by agreeing and recommending methods of best practice across the company.

The Health and Safety Working Party comprises appointed representatives from across the company. It consists of:

- 7.1 Chairman – Head of Health and Safety
- 7.2 Secretary – Health and Safety Officer
- 7.3 Health and Safety Officers
- 7.4 Representatives from the company field 'Delivery' operations
- 7.5 Representatives from the company's administrative staff from regional centres nationwide
- 7.6 Representatives from the company's Quality Assurance (QA) departments.

## **8. Training of Safety Representatives**

In accordance with the Health and Safety (Consultation with Employees) Regulations 1996 (as amended), JTL shall ensure that representatives:

- 8.1 receive such training as is necessary for them to carry out their roles
- 8.2 are given the necessary time off with pay and will pay any reasonable costs incurred in the training mentioned in paragraph 8.1 above.

## **9. Duties and Responsibilities of Safety Representatives**

In accordance with the Health and Safety (Consultation with Employees) Regulations 1966 as amended, representatives of employee safety shall have the following roles to:

- 9.1 participate in the Working Party
- 9.2 take up with the Head of Health and Safety general matters affecting the health and safety of the employees they represent
- 9.3 take up with the Head of Health and Safety concerns about possible risks and dangerous events in the workplace that may affect the employees they represent
- 9.4 represent the employees in consultation with health and safety matters
- 9.5 provide local support and advice on health and safety matters to the employees they represent.

## **10. JTL Offices/Curriculum Managers**

The managers of each JTL office/centre, or a nominated person in their absence, will be responsible for health and safety within their environment and, as such, will achieve the following main objectives to:

- 10.1 be familiar with their obligations under the Health and Safety at Work etc. Act 1974 and all other current legislation and codes of practice applicable
- 10.2 ensure that all members of JTL office/centre staff are aware of the company Health and Safety Policy and its implications to their working environment and responsibilities towards their fellow workers
- 10.3 create and maintain a safe and healthy working environment
- 10.4 ensure that all members of JTL office/centre staff are suitably trained in safety matters, fire precautions, evacuation procedures, safe systems of work and the correct use of equipment and substances
- 10.5 ensure that all equipment is provided and maintained in a safe condition in accordance with the Provision and Use of Work Equipment Regulation. Including establishing and maintaining maintenance/service records of equipment
- 10.6 oversee the appointment and management of sub-contractors in line with JTL's procedure for the Control of Contractors on JTL premises (JTL 881)
- 10.7 ensure that protective equipment and clothing supplied by the company is used and maintained correctly
- 10.8 ensure that any unsafe or unhealthy condition is reported immediately to the appropriate person or department for remedial action
- 10.9 ensure that all accidents are reported immediately and the appropriate form completed so that it can be recorded and fully investigated by the Health and Safety Department in order to prevent a recurrence
- 10.10 set a personal example by doing everything in their power always to work to the company Health and Safety Policy and its implications to their working environment and others.

## **11. Field Staff**

All field staff, in addition to those mentioned in section 11, have the following responsibilities and must ensure that they:

- 11.1 are familiar with their obligations under the Health and Safety at Work etc. Act 1974 and all other current legislation and codes of practice that apply to work environments where apprentices/trainees are employed and ensuring, as far as is reasonably practicable, that these regulations are observed and adhered to
- 11.2 carry out pre-placement vetting of employers
- 11.3 incorporate safety instructions in routine instructions and use best endeavours to ensure that they are obeyed
- 11.4 ensure that apprentices/trainees and young persons learn to take safety precautions
- 11.5 advise those who repeatedly fail to meet their legal obligations in relation to their own well-being and that of others



- 11.6 ensure that defective equipment is not used and ensure that it is reported to the proper authority
- 11.7 avoid taking unnecessary risks
- 11.8 ensure that apprentices/trainees are aware of the necessary health and safety procedures that are required to enable them to become safe workers.

## **12. All Employees**

All employees are expected to recognise and accept the general duties that are imposed upon them under the Health and Safety at Work etc. Act 1974 and, whilst at work, all employees will be expected to:

- 12.1 co-operate, as this is vital to the success of this Health and Safety Policy. Accordingly, all employees are encouraged to bring to the attention of their immediate Line Manager, or any member of the Health and Safety Working Party or Senior Management, any cause for concern on the grounds of health and safety that they may have; and make suggestions through their Line Manager, or any member of the Health and Safety Working Party, which they feel will promote safe working practices within their working environment
- 12.2 take reasonable care of the health and safety of themselves and of other persons who may be affected by their acts or omissions whilst at work
- 12.3 co-operate with the company as their employer, or with any other persons so far as is necessary to enable the company, or any other person, to perform or comply with any duty or requirement which is imposed upon them by, or under, any of the relevant statutory provisions
- 12.4 comply with and adhere to all internal company policies and procedures
- 12.5 not intentionally or recklessly interfere with, or misuse, anything provided in the interests of health, safety or welfare in pursuance of any of the relevant statutory provisions
- 12.6 work in a safe and proper manner at all times
- 12.7 report all accidents, incidents and dangerous occurrences
- 12.8 observe all warnings and abide by restrictive notices
- 12.9 set a personal example by doing everything in their power to always work to the company Health and Safety Policy and take into account its implications on their working environment and others.

**Note:** Attention is drawn to staff's duty under the Health and Safety at Work Act etc.1974: ***"...to take reasonable care for the health and safety of themselves and of other persons who may be affected by their acts or omissions whilst at work and, in addition, to co-operate with the employers so far as is necessary to enable them to fulfil their duties and requirements under the Act..."***

## Part C – Arrangements for Health and Safety

### 1. Review of Health and Safety

The Health and Safety Policy will be reviewed on an annual basis and at any other time it is felt to be appropriate. The effectiveness of the Policy will also be appraised on a regular basis. Any changes felt to be required will be put in place as soon as is practicable. The Head of Health and Safety shall:

- 1.1 carry out periodic inspections of all JTL premises (with the assistance of the Health and Safety team) report findings to the Directors and issue an action plan (where shortcomings in health and safety practice are identified) to the person responsible for health and safety in the office concerned to enable the deficiencies to be addressed within an agreed timescale
- 1.2 co-ordinate a programme of visits on a regular basis to each of the employees employed to work from home to ensure that, where appropriate, any work activity carried out is in accordance with the Health and Safety Policy
- 1.3 be available to give any necessary advice regarding health and safety issues relating to JTL's work activities
- 1.4 carry out continual self-assessment (with the assistance of the Health and Safety team) of the standards and performance of health and safety within JTL, taking into account current health and safety legislation, safeguarding of learners and the Skills Funding Agency's and Welsh Government's contractual requirements. Any identified weaknesses will require an action plan with clear responsibilities and timescales for completion.

### 2. Risk Assessment

The Head of Health and Safety is responsible for arranging all risk assessments in consultation with relevant staff, with the exception of those de facto assessments that are carried out by individuals on a daily basis and need not be recorded due to their simplicity, or there not being any significant risks (e.g. some simple manual handling tasks). The Head of Health and Safety will make arrangements for suitable and sufficient risk assessments to be undertaken in the following circumstances:

- 2.1 following identification of materials containing asbestos or on suspicion that asbestos may be present
- 2.2 where it has been identified that noise may be at a level that constitutes a risk as defined within the Noise at Work Regulations
- 2.3 where it is considered that water systems may pose a risk of legionella
- 2.4 following identification of materials and substances which fall under the Control of Substances Hazardous to Health (COSHH)
- 2.5 following a visit to any of JTL's offices or training centres where it is deemed necessary to carry out a specific risk assessment
- 2.6 when any new item of work equipment or new procedure is introduced
- 2.7 upon taking over new premises
- 2.8 upon the request of any member of staff

- 2.9 on any other occasion where it becomes apparent that a risk assessment is necessary. In addition to the above, risk assessments shall be reviewed and, where necessary, modified under the following circumstances:
- 2.10 annually
- 2.11 following an accident investigation
- 2.12 following any incident reported under the terms of the Conflict Management Policy (Staff Handbook)
- 2.13 where there is reason to believe that an existing risk assessment may no longer be valid or fit for purpose
- 2.14 where there has been a significant change in the matters to which the risk assessment relates.

- The level of detail contained within the risk assessment shall be broadly proportionate to the risk involved. Where the hazards are well-known by all concerned and can easily be communicated from one person to another, or there is no significant risk, there is no need to write down the findings.
- Generic risk assessments concern those activities that have been evaluated as being broadly similar for different working locations. Should any member of staff notice any shortcoming within a generic risk assessment as it applies to their office or working location, they are to make this known to the Head of Health and Safety without delay so that the appropriate remedial action can be taken.
- A written record of all significant findings will be kept. A copy of the risk assessment, which will contain the significant hazards identified together with a list of those who might be harmed, how such harm might occur and the existing control measures used to reduce the risk, will be made known to relevant members of staff.
- Where existing control measures are found to be inadequate for control of the risk, measures will be taken to reduce the level of risk to the lowest level reasonably practicable.

### **3. Training**

The Head of Health and Safety, after consultation with the Human Resources Director, National Delivery Director and, in conjunction with Employee Development, shall:

- 3.1 arrange for all employees to receive, from time to time, such information, instruction and training as may be thought necessary for the promotion of their health and safety
- 3.2 through the management structure, ensure all employees receive periodic information on such health and safety issues as may affect them
- 3.3 ensure that individual staff capabilities as regards health and safety are taken into account. Other areas for assessment should include, but not be limited to, the individual's ability to co-ordinate or manage health and safety, to operate items of work equipment or to lift and carry where appropriate.

With regards to the above, such assessments will usually be made at the induction stage, but will also be necessary for the following reasons:

- 3.4 upon transfer to another location or role within JTL
- 3.5 upon introduction of new work equipment into the workplace
- 3.6 upon a change of responsibility (e.g. promotion to a managerial position)
- 3.7 upon the introduction of new technology into the workplace
- 3.8 upon the introduction of a new system of work
- 3.9 following an accident
- 3.10 following significant absence as a result of a medical procedure or condition.

Where a specific training need is identified, this should be made known to the individual's Line Manager or direct to the Head of Health and Safety to allow for such training as may be thought necessary to be provided.

#### **4. Incident Reporting and Investigation**

Incident reporting (accidents) within JTL is carried out in accordance with the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) 2013.

RIDDOR lists reportable incidents as:

- over 7 days (previously over 3 days\*)
- specified injuries
- dangerous occurrences
- occupational diseases

A full list is available via the HSE website.

*\*All injuries that do not run into the over 7-day category must still be recorded into the accident book.*

'Near misses' that do not result in harm have the potential to do so and therefore must still be investigated and acted upon so far as is reasonably practicable to prevent them from becoming more serious.

#### **With regards to accidents:**

- 4.1 When an employee of JTL sustains any injury whilst carrying out their normal duties and working at their normal place of work, details of the injury should be reported to their immediate line manager.
- 4.2 JTL sees accident investigation as a valuable tool in the prevention of future accidents. Accident investigations will be carried out, if necessary, by competent staff. In most cases the person carrying out the investigation will be the Head of Health and Safety, or Health and Safety Officer. On certain occasions, it may be necessary to appoint another individual or body to conduct the investigation. In such a case, the Director responsible for health and safety within the company shall ensure that the person(s) to be appointed are competent for the task.

- 4.3 All persons carrying out accident investigations are reminded that the purpose of an accident investigation is not to apportion blame. Accident investigations seek to discover the facts surrounding the accident and to make recommendations based on the findings so as to prevent recurrence.
- 4.4 JTL staff appointed to conduct accident investigations should use a camera on their company phone to record photographic evidence, if such evidence is deemed to be necessary by the person conducting the investigation.
- 4.5 Where recommendations to prevent recurrence have been made following an accident investigation, the Line Manager shall take action as may be necessary to ensure that the recommendations are implemented where practicable.

**With regards to near misses:**

- 4.6 Near misses are incidents that do not result in damage to equipment or injury to personnel, but which do have the potential to cause such loss. Examples include tripping over loose/ raised carpets, or narrowly being missed by objects falling from high shelving etc.
- 4.7 Where a member of JTL's staff experiences or witnesses a near miss, they are to report the incident to their line manager, health and safety representative, Health and Safety Officer or the Head of Health and Safety. JTL believes that reporting near misses is an important means of preventing accidents happening. Appropriate action can then be taken to prevent an accident from occurring.

**5. Emergencies: Procedures in the Event of Serious or Imminent Danger**

With regards to fire precautions, JTL is bound by the Fire Safety Order 2006 and must ensure, so far as is reasonably practicable, that all fire hazards are minimised and are controlled to the lowest level possible.

The fire arrangements applying to each of JTL's premises are displayed locally on the relevant notice boards. Local working instructions, which identify what must be done in the unfortunate event of a fire or during a drill, are available for all staff, with further information provided during inductions.

- 5.1 A fire risk assessment for each of JTL's premises will be carried out by a member of the health and safety team. The risk assessment will be available at each premise and shall be maintained on at least an annual basis.
- 5.2 It is the policy of JTL that staff do not attempt to fight a fire, other than a small waste-paper-bin fire, but to raise the alarm and evacuate the premises in accordance with the relevant fire procedures.
- 5.3 All JTL offices and centres will have nominated fire marshals who have been trained accordingly and will take charge in the event of an emergency being realised.

With regards to the points above, all staff will be given the following information and instruction concerning the following:

- a) how to raise the alarm
- b) action to be taken on discovering a fire
- c) evacuation procedure

- d) number, type, location and use of all fire-fighting equipment
- e) location and use of escape routes
- f) location of their assembly area
- g) who the nominated Fire Marshalls are and their location
- h) when required, take part in fire drills.

- 5.4 It is the responsibility of all members of staff to ensure that fire exits and escape routes remain clear and free from obstructions at all times.
- 5.5 Waste and other combustibles must not be allowed to accumulate. Bins must be emptied regularly and any flammable waste should be removed daily.
- 5.6 The persons responsible for JTL's office premises should ensure that all fire exits are marked and that they are kept unlocked at all times when the building is occupied.
- 5.7 Maintenance and testing of fire-fighting appliances is arranged locally by the person responsible for health and safety in that office.
- 5.8 Fire drills, evacuation procedures and alarm tests are carried out locally by arrangement with the landlord, or other parties responsible for fire safety within the building. Local work instructions apply.
- 5.9 Under no circumstances should fire extinguishers be used to prop open doors.
- 5.10 Fire doors labelled 'Fire Door – Keep Shut' should not be kept wedged open during normal use.

## **6. Terrorist Activity**

Although it is deemed extremely rare, it has become clear that external factors with regards to terrorism could affect JTL at some point. Local working instructions on what to do in the unfortunate event of a threat being realised are available to all persons during inductions.

- 6.1 All persons responsible for JTL's offices are provided with a checklist to record telephoned bomb warnings. It has been recommended that such checklists be positioned close to the telephone for ease of use.
- 6.2 All persons responsible for JTL's offices are given information on how to detect suspect packages. This information should be cascaded to all office staff.
- 6.3 Evacuation in the event of a telephoned bomb warning, or on finding a suspect package, should be via the nearest available 'safe' emergency exit or other route. Assembly points should be away from the building and from large expanses of glass. All staff will be made aware of the location of their assembly point.

## **7. First Aid**

First aid facilities are provided at all JTL premises. The aim of first aid at work is to reduce the effects of injury or illness suffered while at work, be they caused by the work itself, or by some other factor outside of JTL's control.

- 7.1 All nominated appointed persons and first-aiders will be trained in accordance with The Health and Safety (First Aid) Regulations. All employees will be made aware of the

appointed person or first-aider, and where they can be located, as well as the location of the office first-aid kit.

- 7.2 An 'appointed person' or 'emergency first aider' is someone who has been given the responsibility of maintaining the contents of the first-aid kit and who is capable of summoning help in an emergency.
- 7.3 A 'first-aider' is a person charged with rendering first aid at work and who holds a valid First Aid at Work certificate of competence in first aid at work.
- 7.4 Those members of staff who are employed to work at home and/or those who travel as a necessary part of their work for JTL are provided with a travelling first-aid kit that should be kept in their car.
- 7.5 It is the responsibility of all staff members issued with a first-aid kit to ensure that it is maintained in a serviceable condition and that the contents are replenished or replaced as necessary.

## **8. Alcohol and Drugs**

JTL believes that the abuse of alcohol and non-prescription drugs can lead to accidents and have a detrimental effect on the health of its employees.

In cases where it is believed that an employee suffers from an alcohol or substance abuse condition, JTL has the authority to require the employee to seek the advice of a medical practitioner and to undergo treatment as advised. It should be noted that such offences may be categorised as misconduct and treated accordingly under JTL's disciplinary procedures, which can be found in the JTL Staff Handbook.

Therefore it is identified that employees must:

- 8.1 not carry out any duties for JTL whilst under the influence of alcohol or non-prescription drugs
- 8.2 inform their line manager, or the Head of Health and Safety, without prejudice to an individual's right to confidentiality as regards medical matters, of any prescription drugs they are currently taking which may affect their ability to work safely, or produces known side-effects
- 8.3 ensure clear communication of information including a description of the drug, how long the course will last and a note of any possible side-effects of which they may have been notified (drowsiness, stomach pains etc.)
- 8.4 allow an assessment to be made, and any necessary measures to be taken, to ensure their health and safety at work.

## **9. Smoking and Vaping**

It has been recognised that legislation identifies that smoking is prohibited in any public areas including any enclosed workplace, public building or on public transport in the UK.

Smoking and passive smoking is medically recognised as being dangerous to health. JTL therefore regards the implementation of this policy as an important step in safeguarding the long-term health of its employees and any visitors to JTL's premises.

Premises means any building, car park or substantially enclosed public or private area

occupied by one or more members of the general public, or a workspace whether used by one or more members of staff. Such spaces include lifts, corridors, stairways, lavatories, rest rooms reception areas or entrances.

**With regards to smoking, JTL recognises that:**

- 9.1 the potential health hazards to employees (and visitors to JTL's premises and workplaces) of smoking and passive smoking and has therefore adopted a Smoke Free Workplace Policy (See Staff Handbook)
- 9.2 it is against the law to smoke in certain public places and, as such, all JTL employees must not smoke in any area within JTL's premises at any time, by any person regardless of their status
- 9.3 where JTL operates from an employee's home, there can be no insistence on a complete smoking ban. Employees are, however, required to respect JTL's policy on a smoke-free workplace when receiving visitors on official JTL business
- 9.4 smoking will be allowed in vehicles belonging to or leased by JTL that are for the sole use of the driver and not usually used as a workplace by anyone else, either as a driver or passenger. However, if carrying a passenger on company business, smoking is not allowed
- 9.5 there are staff who use their own private vehicles for business purposes. With respect to other staff members or members of the public who might be a passenger in privately-owned staff vehicles, staff are asked to respect JTL's policy on a smoke-free workplace.

**E-Cigarettes and Vaping**

With regards to the growing number of persons that are partaking in the use of e-cigarettes – commonly known as 'vaping' – JTL has recognised that it is deemed a similar activity to smoking and therefore identified as such.

Therefore JTL must ensure that:

- 9.6 in accordance with the Smoking Law, the Smoke-Free Workplace Policy is maintained
- 9.7 e-cigarettes and vape-cigarettes are not used within JTL's premises and/or other public places
- 9.8 the charging of e-cigarettes and vape-cigarettes must not be done within JTL premises.

**10. Supervision**

JTL takes the act of supervision very seriously and endeavours to ensure that all persons requiring mentoring and supervision receive it and that it is maintained accordingly.

- 10.1 Persons responsible for health and safety shall ensure that all young and inexperienced workers employed by them shall have an adequate level of supervision to be commensurate with their level of experience and the task at hand.
- 10.2 Where individuals are asked to carry out an unfamiliar task that may affect their health and safety, they should be given adequate information, instruction, training



and, where necessary, supervision, to allow the task to be completed at minimum risk to themselves. It should be noted that this includes not only young persons as defined below, but also those who are new to the task. Effects on health and safety include psychological as well as physical effects. Due care should be taken to limit psychological stress by assigning tasks, the number and nature of which are within the individual's ability to cope.

- 10.3 Where young persons (i.e. those who have attained minimum school-leaving age but who are still under the age of 18 years) are employed, the line manager shall conduct a risk assessment into the work that they are to perform. Such a risk assessment will take into account the individual's lack of experience and lack of awareness of existing or potential hazards. It will also take into account the young person's immaturity, both physical and psychological.
- 10.4 Where children (i.e. those who have not yet reached minimum school-leaving age) are employed, perhaps on work-experience training, the line manager shall conduct a risk assessment, which is similar in scope to that described in 10.3 above.
- 10.5 The line manager responsible for the child shall ensure that the results of the risk assessment detailed above are made available to the persons with legal responsibility for the child, as well as to any organisation or third party responsible for arranging or managing the child's training, e.g. the child's school.
- 10.6 The line manager responsible for a young person, as defined above, shall ensure that a copy of the risk assessment is given to the young person before work commences.
- 10.7 In both the cases described in 10.3 and 10.4. above, the risk assessment shall take place before the young person or child starts work with JTL.
- 10.8 Supervision of apprentices is set out in the employer contract. The level of supervision for apprentices is established during pre-placement vetting and is monitored on a regular basis.

## **11. Temporary Workers**

Temporary workers are those persons that are under the control of an agency, via a private contract, or through other means such as on a work experience basis from a school etc.

- 11.1 All temporary workers will be provided with comprehensive information on health and safety within their office or working environment. Such information will be provided before the temporary worker starts work and should include, but should not be limited to, a guided tour of the premises, paying particular attention to emergency exits and equipment as well as welfare arrangements, a description of the Health and Safety Policy document and an assessment of the temporary worker's ability to carry out the tasks given to them effectively and without risks to their own health and safety, or to that of others.
- 11.2 It is the responsibility of the relevant manager to ensure that any health and safety information provided by the temporary worker's agency (if applicable) is supplied by the agency to the worker (a requirement under the Management of Health and Safety at Work Regulations).

## **12. Homeworkers**

Homeworkers are those persons who work directly from their home as a base to undertake business on behalf of JTL.

- 12.1 Under the Health and Safety at Work etc. Act 1974, employers have a duty to protect the health, safety and welfare of their employees including homeworkers. Most of the regulations made under this Act apply to homeworkers as well as to employees working at the employer's workplace. JTL considers its responsibility toward homeworkers to be equal to its responsibility to any other employee of the company.
- 12.2 The work carried out by homeworkers for JTL has been categorised as LOW RISK and consists mainly of clerical and administrative functions. The main area of risk to employees working at home is from manual handling. A separate risk assessment has been written to address this issue. Advice and guidance is also available on the use of display screen equipment and the attendant hazards. This may be obtained from the Head of Health and Safety and is available on JTNet.
- 12.3 Arrangements exist for testing portable electrical equipment supplied by JTL for use in the home.
- 12.4 There are arrangements in place for periodic inspections of the home workplace by the Health and Safety Officers or members of the Health and Safety team.

## **13. Contractors and Visitors**

Contractors are those persons who enter into JTL premises to conduct their undertaking with respect to their arrangements with JTL. This might be for maintenance or repair work or from a housekeeping purpose.

Visitors are those persons who are invited into JTL premises to meet with JTL personnel for the purpose of carrying out business and/or meetings.

- 13.1 All visitors to JTL's premises will be asked to sign-in before entering and when leaving. This is to ensure that an accurate record of those present in the building is available should an emergency situation arise.
- 13.2 Visitors to JTL's premises shall be informed of the local emergency procedures and first-aid facilities on entry. They shall also be informed of the location of any welfare facilities that may exist i.e. washing and sanitary facilities, eating arrangements etc.
- 13.3 Should it be necessary for contractors to carry out work within JTL's offices, the person responsible for health and safety within that office, together with the Head of Health and Safety if necessary, shall discuss with the contractors how they intend to carry out the job and whether any special equipment will be necessary.

The contractor will be required to complete a JTL permit to work, which will be signed by the contractor, JTL Office Manager and, where appropriate, the Head of Health and Safety. The contractor will also be informed of the emergency procedures and any other necessary information regarding their safety or that of their employee's safety.

In certain circumstances a risk assessment may be necessary, the purpose of which will be to identify the hazards to which JTL employees may be exposed, and to aid in deciding on the most suitable control measures to take to reduce the risk of harm occurring to any JTL employee, contractor or visitor.

## **14. Introduction of New Plant, Machinery, Equipment, Substances or Procedures into the Workplace**

It is identified that at times there may be a requirement to introduce new plant, equipment, materials and substances or procedures to keep up with the demands of change. It is therefore a requirement that JTL must ensure that:

- 14.1 any new item of equipment, plant or machinery, or any substance that falls under the COSHH Regulations that is likely to cause harm, is thoroughly assessed. Where appropriate the Head of Health and Safety will be consulted with regard to any factors that may affect the health and safety of the employees
- 14.2 where appropriate, managers will develop and maintain maintenance and service records of equipment in line with manufacturers' guidelines
- 14.3 all new procedures concerning the health and safety of employees will be assessed by the Health and Safety Working Party, the members of which are the employee's appointed representatives
- 14.4 appropriate training will be given in new plant, machinery, equipment substances or procedures in the workplace if necessary, taking into account the risk assessment and consultation with the Health and Safety Working Party.

## **15. Display Screen Equipment**

As part of JTL's working activities it is identified that most, if not all, members of staff will be required to use computers as part of their routine and job description.

As defined by the Health and Safety (Display Screen Equipment) Regulations 1992 (as amended), 'Users' are defined as 'persons who habitually uses display screen equipment as a significant part of their normal working routine'.

Therefore it is JTL's responsibility to ensure that:

- 15.1 all staff working with display screen equipment (DSE) are informed of the possible hazards and issued with the HSE leaflet 'Working with Display Screen Equipment (DSE)' (HSE ref: INDG 36), the use of which is strongly recommended. Ergonomic assessments are carried out on a regular basis and any measures necessary to reduce the risks to the lowest extent practicable will be taken
- 15.2 ergonomic assessments are carried out on a regular basis and any measures necessary to reduce the risks to the lowest extent practicable will be taken
- 15.3 eye tests will be provided for regular DSE users in accordance with JTL's Corporate Eye Care Package, which can be amended from time to time
- 15.4 all staff undertake the on-line DSE Risk Assessment on a regular basis and in the event of any significant change to their workstation layout
- 15.5 those members of staff who work from home have received a copy of JTL's 'Homeworkers Guide to DSE Health and Safety' JTL833.

## 16. Welfare Facilities

JTL will provide suitable and sufficient facilities to comply with the Workplace (Health and Safety and Welfare Regulations), which provide:

- 16.1 Rest areas and eating of meals
- 16.2 Suitable drinking water facilities
- 16.3 Lighting
- 16.4 Workstation and seating
- 16.5 Maintenance

## 17. Driving on Company Business – Competence to Drive

Employees who drive either company or privately owned vehicles on company business must abide by the procedures set out in **JTL's Driving at Work Policy (JTL825)** at all times.

Therefore, regarding employees who drive on company business, JTL must ensure that all relevant employees are aware that:

- 17.1 they must meet the minimum legal eyesight standards for driving. If you are required to wear glasses or contact lenses as a condition of your fitness to drive, you are responsible for ensuring that you wear them at all times when driving and that you have spare eyewear in your vehicle in case of need at all times
- 17.2 a risk assessment (as per the Driving at Work Policy JTL825) has been made and the findings brought to the attention of all relevant employees. The risk is reviewed at least annually and sent to all employees. It is also available on JTNet
- 17.3 they will be required to validate their competence to drive by submitting a copy of their driving licence upon commencement of employment. Employees will also be required to give their consent to a check of their licence at any time
- 17.4 where they drive their own cars on JTL company business, they are required to maintain insurance at all times, which includes business insurance as part of their insurance policy and, where required, a current MoT certificate. Employees will also be required to give their consent to a check of their MoT certificate at any time
- 17.5 they are required, at all times, to comply with prevailing legislation concerning the use of alcohol, prescribed and unprescribed drugs whilst driving
- 17.6 those who are prescribed drugs, and other medications, which may affect their ability to drive safely, are required to refrain from driving on company business
- 17.7 they are responsible for maintaining their company/own vehicle in a roadworthy condition in compliance with the Road Traffic Act and JTL's Driving at Work Policy (JTL825)
- 17.8 they are obligated to refer to the JTL's Driving at Work Policy (JTL825) for employment requirements on driving on company business.

## **18. Housekeeping**

One of the main causes of injury in offices has been attributed to slips, trips and falls. Attention to sound principles of good housekeeping will help to minimise the risk to employees. In addition to employer's and employees' duties with regards to health and safety, JTL will ensure, so far as is reasonably practicable, that all employees are aware that:

- 18.1 floors, passageways and stairwells should be kept clear of obstructions and trailing leads
- 18.2 all rubbish must be placed in a suitable container and cleared away regularly. Broken glass and other sharp objects should be disposed of carefully and never left exposed in a waste bin
- 18.3 paper and other combustible materials should be stored and used away from obvious sources of ignition
- 18.4 drawers and filing cabinets should not be overloaded, neither should drawers be left open when not in use as this creates a trip hazard and increases the risk of toppling
- 18.5 spilt liquids should be cleaned up immediately. If the area remains wet after the spill has been cleared, employees should be informed to take care. This also applies where vinyl or wooden floors have recently been cleaned by mopping and remain wet.

## **19. Lone Working**

In the HSE guidance document 'Working Alone', a lone worker is defined as someone who works by themselves without close or direct supervision. Establishing a healthy and safe working environment for lone workers can be different from organising the health and safety of other employees. They should not be put at more risk than other people working for you.

Duties carried out by field staff frequently require them to work alone. Therefore JTL must ensure that all relevant employees are aware that:

- 19.1 a generic risk assessment has been compiled to bring to the attention of staff the risks to which they might be exposed when lone working. Where it is felt necessary for an individual staff risk assessment, this will be completed by the Head of Health and Safety in liaison with the HR Manager
- 19.2 personal safety devices are available for issue to those members of staff for whom the risk assessment shows it is necessary, or for those who may require one. These will be made available after contacting the Head of Health and Safety and on completion of a risk assessment
- 19.3 under no circumstances should a member of JTL staff who is driving alone offer a lift to any party whose identity is not well known to them. Further guidance on personal safety is available from the Head of Health and Safety.

## **20. Manual Handling**

Manual Handling Operations Regulations 1992 (as amended) define manual handling as: *"...any transporting or supporting of a load (including the lifting, putting down, pushing, pulling, carrying or moving thereof) by hand or bodily force"*.

Therefore JTL must ensure that all employees:

- 20.1 receive a short programme of instruction in manual handling. This training follows the principles of manual handling as laid down in the Approved Code of Practice for the Manual Handling Operations Regulations 1992. When employees join the company, arrangements will be made for them to receive such manual handling training as may be necessary
- 20.2 are aware that suitable and sufficient risk assessments are carried out on all manual handling tasks and employees are told of any significant risks. Employees should never attempt to lift a weight unless they are satisfied that they can do so safely and without harm to themselves, others in the vicinity or the load itself. They should assess the size and shape of each load, the prevailing environmental factors and know their own limitations before attempting to lift any object. If manual handling cannot be avoided, where possible they should always seek to use some mechanical means of lifting and carrying (e.g. sack trolley or similar), or seek assistance in moving the load.

## **21. New and Expectant Mother**

Female employees of childbearing age, or who are expectant or new mothers, are covered by the Management of Health and Safety at Work Regulations 1999, the Workplace (Health, Safety and Welfare) Regulations 1992 and the Equality Act 2010.

- 21.1 A suitable and sufficient assessment of the risks for JTL employees of childbearing age, those who have given birth in the previous six months or who are breastfeeding, has been undertaken. The results will be made known to relevant employees as required.
- 21.2 The employee should advise her line manager as soon as the pregnancy is confirmed, whereupon she will be issued with a copy of the risk assessment detailed in 202.

## **22. Young Persons**

Young persons are people who have not reached the age of 18. A child is a person who has not reached the minimum school leaving age of 16.

- 22.1 Young person who has been placed in a low risk environment like a JTL office, with everyday risks, existing arrangements are adequate but will be assessed upon placement to ensure their continual health, safety and welfare.
- 22.2 information training and supervision will be provided for the young person's needs.
- 22.3 Parents and careers of the young person will be informed of the assessments accordingly.

## **23. Use of Mobile Telephones**

The use of mobile phones has become a modern prevalence. JTL recognises the fact that mobile phones are issued to the majority of staff for business purposes, and that those staff drive on company business.

JTL also recognises that the use of mobile phones whilst driving has long been a major factor into the causes of road traffic accidents.

Due to the laws surrounding the use of mobile phones whilst in control of a motor vehicle, 'hands-free kits' are allowed for use to prevent physical use of mobile phones whilst driving.

JTL will not provide recompense for hands-free kits bought by those persons who wish them. Those employees who have 'built-in' hands-free systems (e.g. Bluetooth) in their vehicles can use them but only if and when it is safe to do so and proving they find a safe place to pull over as soon as possible to prevent risk to their health and safety and that of other road users.

- 23.1 A risk assessment has been made regarding the use of mobile phones whilst driving. The risk assessment refers to the likelihood of an accident occurring whilst conducting a telephone conversation while the vehicle is in motion.
- 23.2 Whilst mobile phones may be required for work purposes and to summon help in an emergency, no JTL employee shall make or receive a call or message on a handheld mobile phone whilst driving a vehicle, unless it is parked and is safe to do so. The Road Traffic Act definition of driving includes using a mobile phone while the car is stationary with the engine running and the keys are in the ignition.

Please refer to Driving at Work Policy JTL825.

## **24. Portable Electrical Equipment**

All items of portable electrical equipment which require testing or inspection are tested or inspected by JTL employees deemed competent to do so. Such testing is carried out at intervals of no longer than those established within the HSE's guidelines. Table 1, overleaf, describes the HSE's recommended testing intervals (source: HSE/IEE). This table suggests minimum initial test periods. The frequency of inspection may be reviewed if information obtained on faults found indicates that this is necessary.

In the case of staff who work from home, JTL is responsible for the electrical equipment they provide for use at work. Such equipment shall be subjected to an annual visual inspection by the user to ensure it is still safe to use. However, if and when required, such equipment shall be tested within the appropriate period. JTL is not responsible for the employee's electrical installation, or for items of privately owned electrical equipment.

- 24.1 Any employee who identifies any defect on any item of portable electrical equipment is to inform their immediate superior at the earliest possible opportunity. Under no circumstances should any item suspected of being faulty be used until it has been examined by a competent person.
- 24.2 Where possible, all items of portable electrical equipment shall be plugged directly into a 13 amp socket outlet. Under no circumstances should a socket outlet be overloaded by exceeding the rated capacity of that socket outlet, normally 13 amps.

- 24.3 Where it is necessary to use an extension lead, only those carrying British Standard compliance marking are to be used. When using an extension lead, the user should ensure that it has been fully extended prior to use. Failure to do so will cause heat build-up and possible fire. Extension leads are only to be used as a temporary measure.
- 24.4 All items of privately-owned portable electrical equipment that employees wish to bring into JTL premises must undergo testing before they can be used. These items must also be connected to a Residual Current Device (RCD) socket outlet only.
- 24.5 With regards to e-cigarettes and vape-cigarettes, these devices must not be charged within JTL premises via any means due to their potential for fire hazard.

## **25. Personal Protective Clothing and Equipment**

All employees who, in the course of their duties for JTL, might be exposed to risks not adequately controlled by other means, will be issued with personal protective equipment (PPE) as necessary and without charge to the employee in accordance with the following:

- 25.1 All items of PPE issued, together with the date of issue, are recorded in a master log held by the Head Office Administration Department, an assessment made regarding any training necessary and periodic replacement of all items as required.
- 25.2 Any employee who believes their PPE is no longer suitable for the use for which it is intended should contact the Head Office Administration department or inform a member of the Health and Safety Department as soon as possible so that replacement items may be ordered.
- 25.3 If specialist PPE is required – e.g. orange hi-viz flameproof boiler suits – these must be requested and approved via the Head of Health and Safety prior to purchase.



**Table 1. Pat Testing Intervals – Offices and other Low Risk Environments**

<b>Equipment/Environment</b>	<b>User Checks</b>	<b>Formal Visual Inspection</b>	<b>Combined Inspection and Testing</b>
Battery Operated (<20Volts)	No	No	No
Extra Low Voltage: (<50V A/C) e.g. telephone equipment, low-voltage desk lights	No	No	Class II
Desktop computers, VDUs	No	Yes 1 year	No otherwise up to 4 years
Photocopiers, fax machines	No	Yes 2 years	No, if Class II otherwise up to 2 years
Class II equipment, not hand-held and moved occasionally e.g. fans, table lamps, slide projectors	No	Yes 2 years	No
Class II equipment – hand-held e.g. some floor cleaners	Yes	Yes 6 months – 1 year	No
Earthed equipment (class 1) e.g. electric kettles, some floor cleaners	Yes	Yes 6 months – 1 year	Yes, 1–2 years
Cables (leads) and plugs connected to the above Extension leads (mains voltage)	Yes	Yes 12 months	Yes, 1–2 years depending on the type of equipment it is connected to

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