



Dublin International Study Centre

Health and Safety Policy

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Health and safety Policy

Section One: General Requirements

1. Study Group Ireland Limited ("Study Group Ireland" or the "Company") is the owner and provider of Dublin International Study Centre (the "Centre"). The Company is registered in Ireland with the CRO (company number 708206) and has its registered office address at Riverside Two, 43-49 Sir John Rogerson's Quay, Dublin 2, D02 KV60. Study Group Ireland has established, documented, implemented, and maintains this Policy in accordance with the requirements of The Irish Health and Safety Authority.
2. This policy document ("the Policy") establishes the general health and safety aims of Study Group Ireland. Any references to "Study Group" are to Study Group UK Limited and its Standard Operating Procedures, Safe Systems of Work, Risk Assessments, Checklists and Forms shall apply to the Company where they are equal to or better than the national statutory requirements in Ireland.
3. This Policy applies to all persons working within the Company, including directors, senior managers, principals, the centre or departmental heads, supervisors, teachers, home-workers, agency staff and volunteers, whether in casual, part-time or fixed-term contract roles (referred to collectively as "staff"). This Policy also applies to anyone on our premises, including learners, consultants, contractors, and other visitors.
4. The purpose of this Policy is to provide staff and learners with a written statement describing the arrangements in place to protect their health and safety in any Study Group Ireland workplace and undertaking work tasks. This includes employee responsibilities forming part of the arrangements.
5. The Policy will be delivered by a Safety Management System (SMS) based on methodology known as Plan, Do, Check, and Act (PDCA). It is a process-based approach designed to complement other organisational management systems.
 - Plan: Establish the objectives, processes, and resources necessary to deliver results in accordance with the desired Company health and safety goals.
 - **Do:** Implement the plan; execute the processes, whilst collecting the data needed to 'check'.
 - **Check:** Measure and monitor the effectiveness of processes against objectives, legal and other Company requirements. Evaluate effectiveness and report findings.
 - **Act:** Take actions in response to reported findings to make improvements in health and safety performance.

Section Two: Policy Issue

Reviewed by: Paul Cunningham	Review date: 08/2024
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Issued by: Paul Cunningham CMIOSH Health and Safety Manager	Authorised by: Senior Health & Safety Management Team
Initial Issue date: May 2022	Next full review date: 08/2025

Revision	Issue	Section	DESCRIPTION	Reviewer
1	09.2022	Whole Policy	First release	H&S Manager Compliance, Risk and Assurance Board
2	08. 2023	Whole Policy	Annual review	H&S Manager

Legislation
Health and Safety Authority (HSA) Safety, Health and Welfare at Work Act 2005 Safety, Health and Welfare at Work (General Application) Regulations 2016



6. Signed:
7. Simon Belfer, Director, Study Group Ireland Limited Dated: 16 October 2023

Health & Safety Policy

Section Three: Policy Statement of Intent

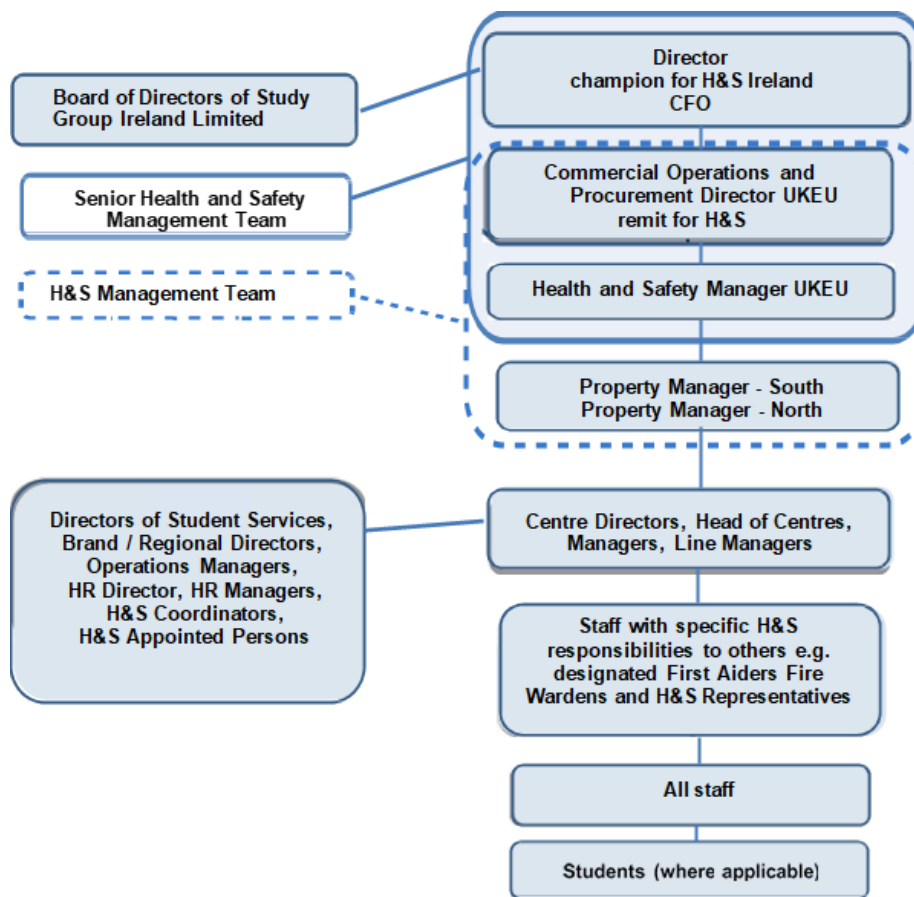
8. Study Group Ireland will, in so far as is reasonably practicable, provide a safe and healthy work and study environment for all staff, learners and others, including those at special risk, according to the requirements of national legislation. This includes when working from home.
9. It is Study Group Ireland's policy to take all reasonable duty of care steps to:
 - Protect the health and safety of anyone who might be affected by our work activities, including staff, learners, visitors, contractors, and members of the public.
 - Provide safe premises, safe equipment, safe systems of work and the means for all staff and learners (where applicable) to stay safe when working with harmful substances;
 - Adequately assess and control health and safety risks arising from our work activities, including at times of Company change;

- Ensure the competence of all staff to do their work; provide training and information where necessary, instruction, and supervision to staff, and, where applicable, to learners and visitors to our premises, to protect their health and safety;
 - Provide staff and learners with adequate welfare facilities and maintain safe and healthy working and studying conditions, including protection from bullying, harassment and discrimination;
 - Provide staff and learners with communication channels to raise any health or safety concerns;
 - Provide staff with access to occupational health arrangements and ensure that staff do not work excessive hours and make full use of holiday entitlement;
 - Provide staff with feedback on performance and consult with them on any matters that may significantly change their working arrangements;
 - Collect and disseminate up-to-date relevant information on health and safety matters, including accidents and incidents arising from our work activities; and have suitable workplace insurance in place.
10. Study group Ireland is committed to ensuring that compliance with statutory health and safety legislation represents the minimum standard of practice. We will continuously strive to foster a positive safety culture through ongoing improvement and implementation of best practices, in accordance with the Safety, Health and Welfare at Work Act 2005 (the “2005 Act”).
 11. Study Group Ireland recognises all regulatory health and safety requirements by the Health and Safety Authority (HSA), including those that specifically apply to owning and operating educational establishments.
 12. The organisation and delivery of health and safety facilities and practices will be maintained and monitored by Study Groups’s central two-tier H&S Management Teams (based in the UK), who will lead by example and enable the Company to discharge its statutory duties.
 13. The H&S Management Teams will review the Company’s health and safety performance on an annual basis or sooner where necessary following legislative or regulatory change, significant change in business operations or a significant incident, and annual objectives will be set and monitored to drive continual improvement in the Company H&S policy and arrangements.
 14. Study Group Ireland will provide sufficient resources to deliver its health and safety objectives.
 15. Staff at all levels will be given the opportunity to contribute towards the development and implementation of health and safety policies and arrangements. Every individual has a role to play in achieving a safe and healthy work environment. All staff are expected to co-operate in delivering the obligations under this Policy to comply with their duties under the Safety, Health and Welfare at Work Act 2005 (the “2005 Act”).
 16. Communication and consultation channels between Company management and staff

will be established and maintained to facilitate staff contribution to the health and safety policies and arrangements of Study Group Ireland.

17. The Policy and associated arrangements will be made readily available to all staff by publication on the Company intranet Huddle H&S site or placement of a hard copy in the workplace locally where Huddle is inaccessible.

Section Four: Organisation of H&S Management within Study Group*



18. *Key post holder details will be communicated on the Company intranet Huddle H&S site.

Section Five: Safety Management System

Planning

Objectives

19. To drive improvement in the Company H&S performance, the Senior H&S Management Team will ensure that the H&S Management Team sets annual Company H&S objectives, which are realistic based on the resources available to the H&S Management Team.
20. Objectives will be SMART: Specific, Measurable, Attainable, Relevant and Time-bound.
21. As a minimum, Company objectives will be set out in a written annual H&S Improvement Plan. Management Team objectives may fully constitute the H&S Improvement Plan or may be in addition to and independent of the H&S Improvement Plan.
22. The H&S Management Team will create and drive H&S policies, procedures, and initiatives to ensure the achievement of the Company's stated objectives.
23. The H&S Management Team will continually monitor the progress and outcomes of H&S policies, procedures, and initiatives to determine and evaluate success against the stated Company objectives. Both Teams will ensure intervention and the implementation of corrective actions when potential or actual deviation from or failure to achieve stated Company objectives is evident.
24. A record of achievement against stated Company objectives will be produced as evidence of achievement. The success of stated objectives will form part of the annual H&S Performance Review.
25. Where appropriate, the Senior H&S Management Team will set managers' individual H&S objectives commensurate with Company H&S objectives, with the expectation that manager objectives become team objectives. Individual performance against personal manager or team objectives will be reviewed as part of a personal performance appraisal.
26. Where objectives are not achieved in a defined timescale, a review will be undertaken. Where an objective still has value, it will be carried forward until ultimately achieved, and greater emphasis paid to preventing further unacceptable delay.
27. Company objectives will be primarily, but not exclusively, based upon the following inputs:
 - Applicable statutory provisions and regulatory compliance requirements.
 - Identified significant risk to the business arising from a potential H&S loss event. Stakeholder concerns.
 - Senior H&S Management Team concerns.
 - H&S Auditor and, H&S Appointed Person feedback to the H&S Management Team.
 - Output from formal H&S Review Meetings.
 - Output from avenues of staff and learner consultation.
 - H&S Audit and incident report findings.
 - Insurance inspection report findings and claim determinations.

- Reactive and proactive H&S monitoring findings.
- Output from occupational health or well-being programmes or campaigns.

28. Company objectives will be based on the following Company H&S Priorities:

- Compliance with applicable statutory provisions and regulatory compliance requirements.
- Reduction in identified significant risk to the business arising from a potential H&S loss event.
- Protection against business activities posing the greatest risk of highest harm to individuals.
- Promotion of a positive H&S culture within the workplace. This includes staff who may be working from home.

29. Acting in accordance with Company Values and Behaviours to:

- Put staff and learners first;
- Be ambitious for success;
- Deliver on our promises;
- Be curious about ways to improve; and
- Huddle to succeed together.

Roles, Responsibilities and Resources

30. The people with key H&S responsibilities are set out in the H&S Management organogram on page 6. For full details of Roles and Responsibilities, see Annex A: H&S Roles and Responsibilities document.

Emergency Preparedness

31. Study Group Ireland will establish, implement, and maintain procedures to:

- Identify the potential for emergency situations,
- Respond to such emergency situations.

32. UCD Estates periodically test its Emergency Procedures in accordance with statutory requirements or otherwise, as it deems necessary based on an assessment of risk. Procedures will be revised as required in accordance with legislative requirements or the findings of any tests or checks undertaken.

Section Six: Implementation and Operation (Do)

Hazard Identification and Assessment of Risk

33. To protect the Health and Safety of people in our workplaces, Study Group Ireland (SGI) will establish, implement, and maintain processes and procedures for continual hazard identification and assessment of risk to determine necessary control measures.

34. Processes will seek to:

- Drive a proactive, rather than reactive, approach to the assessment of risk.
- Result in the identification, prioritisation, evaluation, and timely review of hazards by a process of documented risk assessment and the application of resulting control measures, based on the HSE's '5 Steps of Risk Assessment' approach.
- Involve those undertaking the work activity and/or exposed to the hazards in the process of risk assessment.
- Communicate the relevant findings of risk assessment and the arising required control measures to those undertaking the work activity and/or exposed to the hazards.

35. Procedures will seek to address:

- Applicable risk assessment legal obligations.
- Routine and non-routine activities.
- On-site and off-site activities.
- Activities of the primary groups of people having access to our workplaces, such as staff, learners, contractors, and visitors.
- Activities of the primary groups of people having access to our workplaces at special risk, such as because of age, pregnancy, or disability.
- Activities of other groups of people relative to our workplaces, such as neighbours and trespassers.
- Identified hazards originating outside the workplace capable of having an adverse effect on the H&S of those in our workplaces.
- Environmental hazards.
- Human behaviour, capabilities, and other human factors.
- Infrastructure, equipment, and materials in the workplace, whether provided by the Company or by others.
- The design of work areas, processes, systems, installations, machinery/equipment, and general work organisation, including adaptation to human ergonomics and capabilities.
- Actual and proposed significant changes in Company staffing, activities, operations, arrangements, or product.

36. When determining controls or making changes to existing controls, consideration will be given to reducing the risks according to the following hierarchy in numerical order of priority:
- Elimination
 - Reduction controls by time and/or substitution
 - Engineering controls
 - Administrative controls, including signage, written procedures, and training.
 - Behavioural controls
 - Personal Protective Equipment
37. The Company requires staff to take responsibility for any aspects of H&S management over which they have control and deems hazard identification as the responsibility of all staff. To enable staff to identify hazards, Study Group Ireland will endeavour to provide all staff with training in the principles of risk assessment.
38. Staff who must produce risk assessments as part of their role will be provided with suitable guidance, training and frameworks to carry out the task, appropriate to the nature of the assessment being undertaken.
39. Safety Management System arrangements will be established, implemented, and maintained to address the primary workplace hazards, relative to Company activities, as identified by the process of risk assessment.

Competence

40. Study Group Ireland will ensure that any persons under its control performing tasks that could have a negative impact on H&S within the workplace are competent based on appropriate qualification, experience, and training. Relevant competence records will be kept. This includes both staff and contractors.
41. Staff job descriptions will detail levels of desired and required competence. Where a member of staff is lacking in required or desired skills, the Company will have processes in place to initiate and support the personal development of the individual to achieve any required competence. The selection of contractors will include an assessment of their capability and capacity to undertake the required works safely.
42. The Company will formulate H&S training plans for all staff, including staff with key H&S responsibilities and will operate central H&S training programmes to deliver the plan(s).
43. It will be the responsibility of the H&S Manager to regularly monitor, review and evaluate the success of central H&S training plans and programmes and make suitable adjustments to the plans and programmes, to ensure that they are consistent with SGI's current H&S structure, arrangements, roles, and responsibilities, and to ensure that all training identified as necessary is delivered and completed.

44. Relevant training records will be kept relating to any H&S training programme.
45. Any H&S training programme will take into account and be proportionate to differing levels of:
- Individual responsibility,
 - English language, literacy, numeracy and learning abilities; and
 - Workplace risk, arising from the hazards the individual is exposed to undertaking work activities and / or could give rise to through their work activities.
46. As a result, training programmes will endeavour offering a range of learning mediums to best suit the learning needs and preferences of individuals.

Communication and Consultation

47. Study Group Ireland has appointed a designated Health and Safety point of contact. This individual holds responsibility for health and safety matters.
48. Details of the nominated person(s) is communicated to all staff and learners at DISC on the notice board and in meetings.
49. Study Group Ireland has established suitable and effective communication and consultation channels to ensure the two-way exchange of H&S information and concerns between staff, learners, visitors, contractors, stakeholders, staff with H&S management responsibilities and Study Group Ireland as the employer. These channels may be for general communication or specific H&S matters.
50. Examples of such communication and consultation channels include:
- Staff assembly or email briefings.
 - Staff representation groups.
 - Staff surveys.
 - Staff appraisals.
 - Staff Code of Conduct handbook.
 - Staff 'Huddle' intranet, including the H&S site.
 - Staff brand / departmental / team meetings.
 - Management meetings.
 - Stakeholder meetings.
 - H&S review meetings.
 - Learner assembly or email briefings.
 - Student representation groups.
 - Student surveys.

- Student appraisals.
- Student handbooks.
- Contractor Code of Conduct.
- Visitor guides.
- General / H&S Email communications.
- General / H&S telephone communications, with conference call capabilities.
- Centre H&S signs, notices, and displays.
- H&S policy, procedure, and risk assessment documents.
- H&S announcements via the VLE.

51. Study Group Ireland managers will be encouraged and are expected to operate an 'open door' policy and be easily accessible and approachable to all staff.

Documentation

52. Study Group Ireland has developed H&S documentation to:

- Set out the Policy and related procedures.
- Maintain H&S records required by legislation.
- Maintain the H&S procedures necessary to ensure the effective planning, operation, monitoring and review processes that seek to manage Company H&S risks.
- To demonstrate conformity with our Safety Management System and the achievement outcomes of any objectives, targets, KPIs and/or improvement plans set.

The H&S documentation control procedures require:

- Suitable approval of primary Policy and Standard Operating Procedure documents prior to issue.
- The review, update, and withdrawal of all H&S documents as necessary.
- Evidence of document ownership.
- Evidence of document revision status.
- That the most current versions of documents are in circulation and available for reference at the point of use, with active withdrawal of obsolete versions from circulation.
- Historic versions are kept for as long as legislation requires, or otherwise for as long as they have reasonable validity, and their historic nature is evident.

- Documents are issued and stored in a manner that ensures content remains legible.
- Retention of records in accordance with the requirements of data protection legislation requirements.

Facilities and Use of Equipment

53. To ensure that facilities are fit for occupation and that workplace equipment is safe for use, Study Group Ireland will establish, implement and maintain procedures to identify facilities and equipment used in the workplace that require maintenance, servicing, testing, inspection and/or calibration, to ensure that suitable schedules, programmes and regimes are in place. Schedules, programmes, and regimes will be organised by the Facilities department.
54. Study Group Ireland will ensure that staff are suitably trained to operate facility systems and workplace equipment safely in accordance with paragraph, 6.2.

Incident Reporting and Investigation

55. The primary aim of incident reporting and investigation procedures is to identify causes to prevent a reoccurrence of a situation of potential harm.
56. Study Group Ireland will maintain procedures to report, investigate where appropriate and record incidents of a H&S incident and analyse the associated incident data to:
 - Determine underlying H&S deficiencies and other factors that might be causing or contributing to the occurrence of incidents.
 - Identify the need for corrective action.
 - Identify opportunities for preventive action.
 - Identify opportunities for continual improvement.
 - Address actual and potential non-compliance.
 - Prompt a review of existing or production of new applicable risk assessments.
 - Communicate the results of investigations and data analysis.
 - Ensure that the reporting requirements of RIDDOR (Reporting of Injuries, Diseases and Dangerous Occurrences) take place where necessary.
57. Study Group Ireland will maintain procedures to report, investigate where appropriate and record all safeguarding incidents. These will be separate and additional to H&S incident reporting and investigation procedures and set out in the relevant Safeguarding Policy documents.
58. Safeguarding procedures will recognise where there may be a H&S aspect/deficiency to the incident and ensure that there is inter-departmental communication of, and collaboration to, address matters of shared responsibility.

Operational Control

59. The Company will identify important operations and activities that support the delivery of the Policy or are of sufficient risk as to benefit from standardised procedures, from which Safe Systems of Work (SSoWs), Risk Assessments, Checklists and Forms may result.

60. See Annex B for the Procedures Index.

Section Seven: Checking

Monitoring and Performance Measurement

61. Study Group Ireland will establish, implement, and maintain procedures to monitor and measure H&S performance as appropriate relative to:

- The effectiveness of control measures.
- Tolerable risk.
- The effects of significant organisational or operational change.
- Meeting legislative health monitoring requirements where applicable.
- The success of any H&S Objectives, Targets, KPIs and/or Improvement Plans set.
- Compliance with our Safety Management System.
- The H&S culture within the Company
- Occupational health within the Company.
- Accident and incidents in the workplace.

62. Study Group Ireland will make use of various methods to achieve monitoring and performance measurement, such as:

- Reporting.
- Walk arounds / safety tours.
- Checks.
- Inspections.
- Reviews.
- Audits.
- Surveys.

63. Study Group Ireland will encourage senior and departmental managers to take part in H&S monitoring and performance measurement.

64. Study Group Ireland will have an annual rolling programme of H&S site audits and will

assign dedicated resources to this task. The programme will be delivered by competent persons.

65. Where appropriate to the departmental risks, 6 monthly or monthly site or departmental H&S tours, checks, or inspections will take place.
66. Monitoring will be implemented, or existing frequency increased where significant non-conformity or incident prompts greater frequency.
67. The findings of monitoring and performance measurement will be documented and retained for five years. It will be shared appropriately with those who should be aware of the information and those that have a responsibility to act on the information, such as site and departmental managers, designated H&S persons, H&S Representatives, and H&S review groups.
68. Study Group Ireland will drive internal H&S monitoring and performance measurement, but is also subject to external (regulatory), which will include aspects of Centre H&S management.

Section Eight: Action

Non-conformity; Corrective and Preventative Actions

69. Study Group Ireland will act on the findings of monitoring and performance measurement. The Board will ensure that suitable and appropriate layers of management are in place throughout the Company with the authority to take action to address H&S non-compliance and effect operational change where necessary.
70. Significant non-conformity will be addressed to:
 - Ensure corrective actions are taken to remedy a deficiency.
 - Mitigate the consequences of a deficiency.
 - Determine the source and cause of a deficiency.
 - Identify opportunity to prevent reoccurrence of a deficiency.
 - Identify opportunities for improvement of a deficiency.
 - Ensure that reporting of any deficiency takes place where required.
 - Ensure that workplace risk assessments are reviewed as necessary.
71. Records of actions taken will be made and retained for suitable periods of time.

Management Review

72. The H&S Management Team will review the H&S performance of Study Group Ireland on an annual basis and make an annual submission to the H&S Senior Management Team (the “Management Review”). The H&S Champion will make the findings of the Management Review available to the Board through the relevant geographic

Compliance Risk Assurance Board (CRAB).

73. The findings of Management Reviews will be documented and retained for suitable periods of time. Input to a Management Review will include:

- A summary of the results of internal H&S audit programmes
- A summary of any significant findings of other monitoring measures
- A summary of identified significant H&S non-compliance.
- A summary of significant H&S improvements made.
- A summary of H&S budget expenditure
- A summary of any H&S regulatory body visits and findings
- A summary of any H&S related enforcement action taken
- A summary of accident and incident data, with additional details of any significant incidents
- A summary of any H&S related civil compensations claims
- A summary of any significant H&S complaints
- Details of any external stakeholder H&S related input or concern
- Details of any changes to Legislation governing H&S or other similar requirements which are or could have/having a significant impact on our H&S arrangements.
- A review of the previous year's annual H&S Improvement Plan

74. This Management Review will identify opportunities for improvement, consistent with Study Group Ireland's commitment to continual improvement, and the need for any changes to be made to the H&S Policy Intent, H&S Organisation or Safety Management System of Study Group Ireland, to ensure its continuing suitability, adequacy, and effectiveness.

75. Outputs from a Management Review should include:

- Evaluation of the H&S Policy and Safety Management System
- Evaluation of H&S performance and compliance
- Evaluation of H&S resources
- Evaluation of objectives / Improvement Plan success
- Recommendation for improvements and setting the H&S Corporate for the year ahead.

Annex A: Roles and Responsibilities

Section One: The Board

76. The overall responsibility for H&S lies with the Board, which is ultimately accountable for protecting the health and safety of all staff, learners, visitors, hired contractors and members of the public in relation to the activities of the Company. The Board must ensure that:

- They must ensure that the Company operates with a H&S Policy describing H&S arrangements that are in place, which is revised at suitable intervals and brought to the notice of all staff. It should ensure that the Policy is implemented in any business area for which the Board has responsibility.
- It has nominated a Director of the Board as the H&S Champion with specific responsibility for championing statutory compliance and the implementation of good H&S practice within the Company.
- There are suitable and appropriate layers of management in place throughout the company with the authority to take action to address H&S non-compliance and effect operational change where necessary.
- It supports the H&S Champion by providing adequate and appropriate financial, human, technological, and other resources to adequately implement the Policy.
- It agrees on an annual H&S budget to support the planning and undertaking of H&S initiatives by the H&S Management Team.
- It considers H&S a high business priority and considers the impacts on H&S of any significant business change at the planning stage.
- It demonstrates commitment to H&S compliance and good standards of H&S practice by its actions and leading by good example.
- It requires H&S monitoring and performance reports at intervals of at least annually.

Section Two: Directors with specific responsibilities for H&S

77. Study Group's Chief Financial Officer (the H&S Champion) and Study Group's Commercial Operations and Procurement Director will together with the H&S manager form the Senior H&S Management Team.

78. The H&S Champion must ensure that:

- The Policy is implemented and maintained in accordance with legal requirements.
- Sufficient resources, including human and financial resources, Company structure, specialist skillsets and technology that are essential to implement, maintain, and improve the Safety Management System are available to the H&S Management Team and the Company as a whole.
- Roles defining key H&S responsibilities, accountabilities, and delegated authorities to facilitate effective H&S management are allocated, and such roles, responsibilities, accountabilities, and authorities have been documented and communicated.

- Reports detailing the H&S performance of the company are presented to the Board annually (or more frequently if requested).
- Where a Centre Director or Head of Centre is not in post, ensure that a designated manager with H&S responsibilities is in place to act as the centre's H&S Appointed Person.

79. The H&S Champion and Study Group's Commercial Operations and Procurement Director, in collaboration with the H&S Manager, form the Senior H&S management team. They are responsible for the general management and operation of H&S within the Company, ensuring compliance with legislation and that good practice is adopted, providing advice and guidance as appropriate.

80. Together, the Senior H&S Management Team should:

- Demonstrate commitment to H&S compliance and good standards of H&S practice by their actions and leading by good example.
- Be the leading advocates for H&S within the Company, generating awareness of significant H&S requirements within higher levels of Company management.
- Promote the inclusion of H&S within higher-level business planning where applicable and require that H&S is formally discussed and minuted at senior-level management meetings.
- Liaise with the Board as necessary to ensure that adequate financial, human, technological and other resources are allocated to the management of H&S.
- Make recommendations to the Board on health, safety, and welfare matters affecting the Company.
- Set any Company H&S targets or KPIs.
- Agree/formalise and publish the annual H&S Improvement Plan for the Company.
- Retain ultimate authority for approval of H&S policies, arrangements, and initiatives and apply this authority where they see fit or as necessary to resolve discord.
- Request monthly H&S reporting.
- Ensure that the Company's insurers have been informed of any incident likely to result in a claim against the Company insurance policies and that, where required, incidents have been reported to the H&S regulator in accordance with RIDDOR or equivalent overseas EU statutory requirements.
- Ensure programmes of staff training are in place to equip staff with the necessary knowledge and skills to undertake their work safely.

Section Three: Health & Safety Manager

81. The H&S Manager, in collaboration with Study Group's Commercial Operations and Procurement Director, is responsible for the general management and operation of H&S within the Company, ensuring compliance with legislation and that good practice is adopted, providing advice and guidance as appropriate. Responsibilities include:

- To ensure that an appropriate and effective H&S policy (the "Policy") and Safety Management System ("SMS") is maintained that meets statutory requirements and is appropriate to the Company's business operations. To identify and implement improvements to the Policy and SMS.
- To prepare and approve H&S documentation as necessary, including policies and procedures, and evaluate and validate risk control documentation produced by staff to ensure that it is suitable and sufficient, including providing support and assistance to any member of staff tasked with risk assessment.
- To inform senior managers of new or amended H&S legislation that has / will have an impact on the way Study Group Ireland Ltd operates and assist with the introduction of any changes to working practices where necessary.
- To provide advice and guidance to senior management on all matters of H&S, including safe systems of work, suitable control measures, suitable monitoring systems, and current best practices.
- To ensure that H&S team responsibilities and available resources are allocated and clearly defined. To manage the H&S team and ensure that team members carry out the duties of their roles to a professional standard and are focused on and contributing towards achieving team objectives, targets, or KPIs.
- To ensure that a H&S support and advice network exists throughout the Company, which comprises staff with suitable and sufficient technical competence relevant to their H&S duties.
- To assist and support the work of H&S Co-ordinators and H&S Appointed Persons and define the duties of these roles. To define the H&S responsibilities of all staff.
- To conduct H&S Committee meetings where these are required and conduct H&S Review meetings as appropriate.
- To implement and oversee scheduled H&S Audit and Fire Safety Risk Assessment programmes.
- To prepare, manage and allocate the annual H&S budget.
- To select and appoint approved H&S Suppliers.
- To maintain the Huddle H&S site to provide easy staff access to the documentation forming the Policy and SMS.
- To regularly monitor, review and evaluate the success of central H&S training plans and programmes and make suitable adjustments to the plans and programmes, to ensure that they are consistent with current Company H&S structure, arrangements, roles and responsibilities, and to ensure that all training identified as necessary is delivered and completed.
- To ensure that good quality and robust accident and H&S incident investigations take place where necessary. Acting as lead investigator in the case of serious incidents.
- To inform the Company's insurers of any incident likely to result in a claim against the Company and, where required, report incidents to the H&S regulator in accordance with accident and dangerous occurrence reporting or equivalent overseas EU statutory requirements.

- To be the primary point of contact within Study Group Ireland Ltd for any H&S regulator.
- To report on H&S management within Study Group Ireland Ltd monthly to the Study Group's Compliance, Risk and Assurance Board.
- In collaboration with the Study Group's Commercial Operations and Procurement Director, undertake and report on an annual H&S Management Review and propose an associated annual H&S Improvement Plan.
- To collaborate with senior HR management to implement occupational health arrangements as necessary and introduce occupational health arrangement improvements.
- To proactively keep personal H&S technical competence current.

Section Four: Centre Directors, Heads of Centre, and Property Manager

82. At the Centre level, the overall responsibility for day-to-day H&S lies with the Centre Director or Head of Centre. They will be supported in their duties by key Company personnel such as the Property Manager or H&S Manager. The Centre Director/Head of Centre must lead by example and is responsible for defining clear responsibilities for the management and implementation of H&S within the academic and, where applicable, other premises under their control. Primary H&S responsibilities include:

- Maintaining safe workplace premises, including safe access and egress;
- Ensuring that workplace equipment is safe;
- Ensuring safe methods for the use, handling, storage and transport of harmful substances;
- Overseeing safe systems of work; and,
- Ensuring that all staff are provided with necessary H&S information, instruction, training and supervision.

83. The Centre Director must also ensure that suitable and sufficient fire safety and evacuation arrangements are in place, including:

- Suitable fire safety systems are installed, tested and maintained.
- Emergency Evacuation Plans are prepared and maintained.
- Systems and plans are tested by means of practice drills, which are ideally termly, but at least 12 monthly.
- Sufficient fire marshals are in post to effect a safe fire evacuation.
- Ensuring emergency escape routes remain unobstructed.
- Responsible for preparing and maintaining a fire safety risk assessment and ensuring

that any improvements/amendments identified as a result are implemented.

84. The Centre Director/Head of Centre with the Property Manager is also responsible for:

- Ensuring that all workplace facilities and equipment are subject to statutory inspection and testing as required, including portable appliance testing (PAT), electrical system inspections, elevator system inspections, and air conditioning inspections.
- Ensuring that it has been determined if the premises contain asbestos and, where asbestos is present, that an Asbestos Register and associated Management Plan is prepared and maintained.
- Ensuring that the workplace and work equipment are adequately checked (which is recorded) and a system of documented defect reporting and repair is in place. To ensure that the findings of any site safety audit or inspection are documented, circulated, and acted upon as appropriate.
- Ensuring that bespoke local safety policies and safe working procedures are prepared for the premises and workplace activities, relative to the nature of site occupants; these must not conflict with and instead seek to complement the primary H&S Policy and Procedures (Annex B).
- Ensuring that all workplace facilities and equipment display statutory safety signage as required.
- Ensuring that legally required H&S notices and documents are made easily available / displayed in the workplace and kept current, specifically an Employer's Liability Insurance Certificate, a H&S Poster, and the H&S Policy.
- Not permitting a charge to be made for any equipment that is necessary to protect health and safety.
- Co-operating and co-ordinating on matters of H&S with any other employers Study Group Ireland Ltd shares premises with.
- Ensuring that adequate resources and facilities are provided so that the requirements of the H&S Policy can be achieved.
- Establishing the necessary Company structure and arrangements to effectively implement the H&S Policy, including the appointment of a H&S Co-ordinator or H&S Appointed Person and a Display Screen Equipment Assessor. Where there is no appointment of a H&S Coordinator or H&S Appointed Person, the Centre Director or Head of Centre must fulfil this role.
- Establishing a suitable and effective management structure and staff complement to ensure safe workplace operations and activities.
- Ensuring that all workplace activities are underpinned by a documented system of suitable and adequate risk assessment undertaken by competent persons.
- Ensuring that arrangements for the production of Young Person's Risk Assessments, Maternity Risk Assessments, Personal Emergency Evacuation Plans (PEEPs), and DSE User Assessment are in place.
- Ensuring that suitable and adequate first aid arrangements are in place, determined by a First Aid Needs Risk Assessment.

- If lone working takes place, ensuring that suitable lone working arrangements are in place, with a risk assessment setting out the control measures to be employed.
- Ensuring that systems are in place to deliver H&S information, instruction, and training to staff, learners, contractors, and visitors as necessary.
- Ensuring staff, learners, contractors, and visitors receive an appropriate induction to the workplace, detailing emergency procedures, and are suitably supervised during their time on site and/or undertaking work activities.
- Ensuring that formalised disciplinary procedures are in place, which should be invoked where necessary to reinforce the requirement on staff to comply with the H&S Policy and other H&S provisions.
- Having accident and incident investigation, reporting and reporting systems in place and ensuring that accidents and incidents are identified and reported to the H&S regulator (via the H&S Manager).
- Consulting with staff over any significant change to their H&S arrangements.
- Receiving regular feedback from the site H&S coordinator or H&S Appointed Person on matters of H&S as a minimum to ensure that a schedule of routine calendar appointments is in place to achieve this.
- Seeking advice from the H&S Manager on all H&S matters beyond their familiarity and technical competence.

Section Five: Health and Safety Coordinators and Office Managers

85. Primarily in place to support and assist the respective Centre Director, Head of Centre, or Property Manager with the management of their H&S responsibilities at the local site level. Duties include:
- Proactively seek to identify foreseeable hazards in the workplace by proactively making safety checks and undertaking safety tours and inspections as necessary. To proactively drive the remediation of any deficiencies or defects found.
 - Support and assist the respective Centre Director, Head of Centre, or Centre Manager with their H&S responsibilities.
 - Support and assist other staff in a position of control with their H&S responsibilities.
 - Co-ordinate and enable H&S arrangements, which may involve multiple buildings across a single 'site'.
 - Act as the local point of H&S information, advice, and guidance, only in so far as competence (training and experience) permits. To conduct research and staff consultation as necessary.
 - Support and assist with the implementation of good local safety policies and safe working procedures as required, with reference to the primary H&S Policy and Safe Procedures at all times.
 - Identify weaknesses in primary H&S Policy and Safe Procedures and bring these to the attention of the H&S Manager.

- Proactively seek to identify foreseeable hazards in the workplace by proactively making safety checks and undertaking safety tours and inspections as necessary. To proactively drive the remediation of any deficiencies or defects found.
- Proactively review the site risk register and identify gaps; ensure that all workplace tasks (including use of specific equipment and substances of harm) of significant risk have an associated risk assessment, which is of suitable and sufficient quality, i.e. a clear task, dated, author given, signed and review date set.
- Support and assist anyone tasked with preparing a risk assessment or PEEP as required to guide in the adaptation of any existing generic risk assessment.
- Give guidance on potential risk assessment control measures, such as the selection of available and suitable protective clothing, safety equipment, and manual handling aids.
- Ensure that suitable and sufficient protective clothing, safety equipment and manual handling aids are available as appropriate and that it is correctly used and maintained, promoting the existence and use of these items with staff.
- Make H&S based communications and disseminate important H&S information to staff as necessary; any H&S Notice Board must be kept current and free of non-H&S items.
- Act as the main point of contact for and ensure the exchange of relevant H&S-based information with any other employer sharing the site. To liaise, co-ordinate, and co-operate with such employers to ensure the H&S of all persons on site.
- Ensuring that all high-risk work tasks are carried out under a documented and recorded Permit to Work arrangement. To assist with the production of a Permit to Work as required and proactively seek to identify all site works that should be covered by this arrangement and ensure implementation.
- Compile a monthly Accident and Incident Report for the site and submit this to the H&S Manager (via email using the 'ukhands' address).
- Be the site point of receipt of Incident Reports and investigate these reports as necessary to identify cause. To drive the remediation of any identified deficiency or defect as a result of investigation and must not allow any significant hazard or deficiency identified that could cause serious harm to remain.
- Promptly bring any serious or reportable incidents to the attention of the H&S Manager and ensure that site accident and incident records are kept for a minimum of 3 years in a manner that is organised and makes them easily retrievable.
- Ensuring that local emergency plans exist and are maintained.
- Ensuring that the regular and routine checks are made on emergency arrangements and recorded, which are in accordance with any statutory provisions that apply, such as the state of evacuation routes and exits, the functionality of fire detection and alarm systems, fire extinguisher contents and presence and first aid kit contents.
- Ensuring that a programme of suitable and sufficient H&S training is in place for staff and arrange with the H&S Manager for any H&S training identified as necessary. To ensure that H&S training is documented, recorded, and maintained (refreshed) as is necessary and in accordance with any statutory requirements, and that systems are

in place to achieve this.

- Ensuring that all persons (staff, learners, contractors, and visitors) coming onto the site receive an appropriate induction to the workplace, detailing emergency procedures.
- Attend and contribute to H&S Committee or Review meetings as required.
- Provide regular and routine feedback on matters of H&S to the respective Centre Director, Head of Centre or Manager.
- Support and enable any programmes of safety auditing and drive implementation of any report findings that recommend improvement works as appropriate; to advise on report recommendations as necessary.
- Act as the liaison conduit between the respective Centre Director, Head of Centre, and the H&S Manager.
- Liaise with and work collaboratively with any H&S Appointed Person in post.
- Seek advice from the H&S Manager on all H&S matters beyond their familiarity and technical competence.
- Demonstrate good H&S practices and always set a positive example to H&S.
- To have a personal positive approach to H&S and play a significant part in creating a positive H&S culture at the site(s).
- Proactively keep personal H&S technical competence current.
- Seek advice from the H&S Manager on all H&S matters beyond their familiarity and technical competence.

Line Managers must, in relation to homeworkers:

86. Ensure that they support all their staff when working from home to ensure that they have a safe place to work, E.g., frequent communication, DSE Assessments, and reasonable adjustments where required. They must liaise with and work collaboratively with the H&S Manager.

87. Teaching staff must, in relation to learners:

- Implement effective and appropriate levels of supervision of learners, applying guideline levels of supervision when conducting off-site visits and excursions.
- In the case of any kind of building evacuation (fire) alarm, marshal learners from the building and supervise/control them at the Assembly Point.
- Where applicable, ensure that the significant findings and required control measures resulting from risk assessment are made known to learners.
- Set a positive H&S example, demonstrating safe working practices and giving clear safety instructions to learners.
- Educate learners about H&S in the workplace and seek to engage learners with H&S by involving them in practices such as risk assessment.

- Encourage learners to take H&S matters seriously and help them understand their own responsibilities for complying with H&S signage, rules, and procedures, as well as any instructions given for the purpose of their safety or in an emergency.

Section Six: Health and Safety Appointed Person

88. Primarily in place to support and assist the respective Centre Director, Head of Centre, or Property Manager with the management of H&S at the local site level. This includes the same duties as a H&S Co-ordinator, but likely to a lesser degree, based on the site being small and / or a shared premises, where responsibility for site H&S is shared with a host premises and potentially akin to the more administrative based. They must liaise with and work collaboratively with any H&S Co-ordinator that is in post.

Section Seven: Other staff with specific H&S responsibilities

89. First Aiders, Fire Marshals, and H&S Representatives must:
90. Carry out their H&S duties in accordance with any policies relating to (First Aid and Fire Evacuation) policy, their job description (e.g. in the case of a nurse) or legislation (H&S Representative).

Section Eight: All staff

91. All staff, irrespective of their position, have statutory responsibilities (general duties) to:
- Take reasonable care for their own health and safety and that of others who may be affected by their actions or omissions at work, such as:
 - To note, understand, and comply with safety instructions and safety warning signs.
 - To familiarise themselves with local first aid and fire evacuation arrangements.
 - To inform their line manager if feeling unwell and/or if taking any medication that may affect their ability to undertake work safely.
 - To refrain from work if under the influence of any substances which may affect their ability to work safely.
 - No person shall intentionally or recklessly interfere with or misuse anything provided in the interests of health, safety, or welfare.
 - To not undertake any work which they perceive may be unsafe, or for which they have not been sufficiently trained to undertake safely, reporting their concern to their line manager.
 - To make use of any equipment in the workplace provided to protect H&S, such as manual handling aids and respiratory / personal protective equipment (R/PPE).
 - To ensure the H&S and the safe behaviour of any visitor or contractor personally

brought onto a Study Group Ireland premises. This will entail supervision of the third party and providing them with suitable and sufficient safety information.

- Use all machinery, equipment, materials, substances, vehicles, and safety devices in accordance with any relevant training and instructions.
- Co-operate with their employer so far as is necessary to enable them to comply with their H&S responsibilities, and to not recklessly or willfully interfere with, or misuse, anything provided in the interests of health, safety or welfare, such as:
- To participate in H&S meetings, briefings, consultations, training, and programmes as appropriate.
- To make a record of accidents in the site Accident Book and make records of incidents on Incident Report Forms.
- To refrain from purposefully causing a 'false' fire alarm.
- Inform their employer, or any person with H&S responsibility, of any foreseeable shortcoming in the H&S arrangements of Study Group Ireland, or of any work situation posing a foreseeable serious and immediate danger to health and safety, such as:
- To promptly report any accident or H&S incident to their line manager.
- To promptly report any accident or H&S incident to the site H&S Co-ordinator or H&S Appointed Person.
- To report any faulty equipment or hazardous premises defect to the site Facilities Team.
- To report the discharge of a fire extinguisher to the Facilities team (for replenishment).

Section Nine: Learners

92. Although learners don't have any obligations under the Health and Safety legislation, in order to keep them safe whilst in our care, we must encourage them to take health and safety matters seriously and help them understand their own responsibilities for complying with safety rules and procedures. They must also comply with any instructions given for the purpose of their safety, particularly in an emergency situation.

93. Learners will be instructed and encouraged to:

- Be responsible for their own health and safety and that of their fellow learners.
- Comply with all systems and procedures designed to protect them from dangerous situations and conditions.
- Follow safety rules as instructed by their teachers or relevant member of staff, in particular those given in the event of an emergency,
- Not to misuse or recklessly interfere with any equipment provided for safety.
- Report any accidents, any faulty equipment, or other safety defects evident.

94. All learners should follow all health and safety information and instruction that is conveyed to them through induction sessions, booklets/handbooks, notice boards, signage, verbally and or by any other means of communication.
95. If there is any aspect of health and safety, information, and instruction that is not understood, a learner must ask for clarification. It is the responsibility of Study Group Ireland to create an environment where learners are happy and comfortable to ask questions.

Health and Safety Policy & Safety Management System

Annex B: General Arrangements

Policy

Asbestos Management Policy
Health and Safety Policy
Lone working Policy
PPE Policy and Procedure
Risk Assessment Policy

Planning

Asbestos Management Plan
Fire Safety Management Plan
General Risk Assessments
Health and Safety Legislation
Register Health and Safety Objectives
Level 1 Risk Assessments
Level 2 Risk Assessments Risk Management
Risk Assessments Guidance

Implementation and Operation

Asbestos Management Guidance COSHH procedure
DSE and Computer Use Procedure Electrical Safety Procedure
Fire Emergency Evacuation Plan Fire Safety Management Procedures First Aid Procedures
Health and Safety Guidelines Incident Reporting and Investigation
Induction and Training Procedure Legionella Procedure Management of Contractors
Procedure
Manual Handling Procedure Personal Emergency Evacuation Plan Safety Permit System
Waste Management Procedure Working at Height

Checking and Corrective Action

Accident and Incident Reporting
Health and Safety Evaluation of Compliance Internal Audit

Document Control

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