

Health and Safety Policy & Safety Management System

Study Group UK & EU

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1. General Requirements

Study Group UK Ltd based at Britannia House, 21 Station Street, Brighton, East Sussex, BN1 4DE has established, documented, implemented, and maintains this Policy in accordance with the requirements of The Health and Safety at Work Act 1974.

This Policy document (“the Policy”) establishes the general health and safety aims of Study Group UK Ltd and of its wholly owned subsidiary companies.

Study Group UK Ltd (referred to as “Study Group UK” or “the Company”), own and operates a number of educational establishments and programmes comprising of operating brands known as International Study Centres and Study Group Distance Learning

The entity ‘Study Group UK’ operates in the UK and overseas (in Europe), where a Health & Safety Policy may not legally apply. However, Study Group UK applies the Policy to all operations of the organisation wherever in the UK or Europe they may be based. The Standard Operating Procedures, Safe Systems of Work, Risk Assessments, Checklists and Forms forming our arrangements apply where they are equal to or better than that of national statutory requirements outside of the UK.

This Policy applies to all persons working at all levels within the Company, including directors, senior managers, 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 “employees” or “staff”). This Policy also applies to anyone on our premises, including consultants, contractors, and other visitors.

The purpose of this Policy is to provide employees with a written statement describing the arrangements in place to protect their health and safety in a Study Group UK workplace and undertaking work tasks. This includes employee responsibilities forming part of the arrangements.

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 and is a method advocated by the UK H&S regulator; the Health & Safety Executive (HSE).

Plan: Establish the objectives, processes, and resources necessary to deliver results in accordance with the desired organisational 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 organisational requirements. Evaluate effectiveness and report findings.

Act: Take actions in response to reported findings to make improvements in health and safety performance.




2. Policy Issue

Reviewed by: Paul Cunningham	Review date: 08/2022
Issued by: Paul Cunningham	Authorised by: Senior Health & Safety Management Team
Issue date: May 2016	Next full review date: 08/2023

REVISION	ISSUE	SECTION	DESCRIPTION
1	08.2018	Whole Policy	Full review
2	08.2019	Whole Policy	Full review
3	08. 2020	Whole Policy	Full review
4	09.2021	Whole Policy	Full review
5	09.2022	Whole Policy	Include homeworkers and changes to Organisation H&S Management
6	30.2022	General	Change of registered address

Signed:



Alison Alfors, Director, Study Group UK Ltd

Dated:

September 2022

Health & Safety Policy

3. Policy Statement of Intent

At the heart of health and safety delivery within Study Group UK is the preparation of students for life in a global society and success in a global economy, enabling them to realise their potential through a transformational and exceptional learning experience.

Study Group UK will, in so far as is reasonably practicable, provide a safe and healthy working and studying environments for all employees, students and others including those at special risk, according to the requirements of national legislation of the countries in which the business operates. This includes when working from home.

It is Study Group UK'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 employees, students, visitors, contractors, and members of the public.
- Provide safe premises, safe plant/equipment, safe systems of work and the means to stay safe when working with harmful substances for all employees and, where applicable, students.
- Adequately assess and control health and safety risks arising from our work activities, including at times of organisational change.
- Ensure the competence of all employees to do their work; providing training where necessary and the necessary information, instruction, and supervision to employees, and where applicable to students and visitors to our premises, to protect their health and safety.
- Provide employees and students with adequate welfare facilities and maintain safe and healthy working and studying conditions, including protection from bullying, harassment and discrimination.
- Provide employees and students with communication channels to raise any health or safety concerns.
- Provide employees with access to occupational health arrangements and ensure that staff do not work excessive hours and make full use of holiday entitlement.
- Provide employees with feedback on performance and consult with them on any matters that will 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.
- Have suitable workplace insurances in place.

Basic compliance with statutory H&S legislation is the minimum acceptable standard, and Study Group UK will strive to achieve a positive safety culture based upon continual improvement and best practice.

Study Group UK will recognise all regulatory health and safety requirements including those that specifically apply to owning and operating educational establishments.

The organisation and delivery of H&S facilities and practices will be maintained and monitored by the two-tier H&S Management Teams, who will lead by example and enable the organisation to discharge its statutory duties.

The H&S Management Teams will review H&S performance on an annual basis or sooner where necessary following legislative or regulatory change, significant change in business operations or significant incident,

and annual objectives will be set and monitored to drive continual improvement in organisational H&S policy and arrangements.

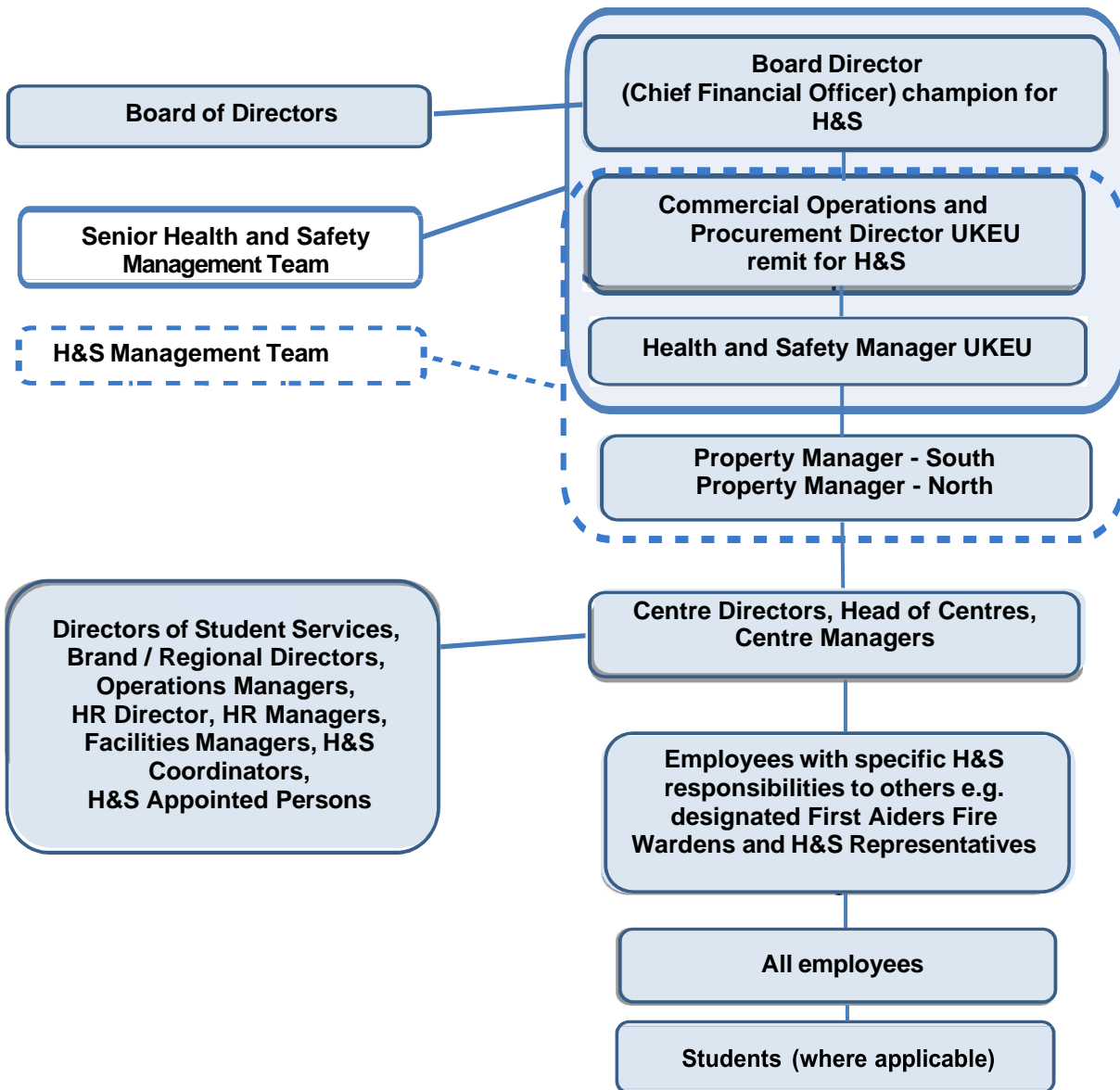
Study Group UK will provide sufficient resources to deliver its H&S objectives.

Employees at all levels will be given the opportunity to contribute towards the development and implementation of H&S policies and arrangements. Every individual has a role to play in achieving a safe and healthy work environment. All UK Employees are expected to co-operate in delivering this Policy for complying with their duties under The Health and Safety at Work Act 1974.

Communication and consultation channels between Company management and staff will be established and maintained to facilitate employee contribution to the H&S policies and arrangements of the organisation.

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

4. Organisation of H&S Management within Study Group UK*



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

Safety Management System

5. Planning

5.1 Objectives

To drive improvement in Company H&S performance, the Senior H&S Management Team will ensure that the H&S Management Team set annual organisational H&S Objectives, which are realistic based on the resources available to the H&S Management Team.

Objectives will be SMART: Specific, Measurable, Attainable, Relevant and Time-bound.

As a minimum, organisational 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 Improvement Plan.

The H&S Management Team will create and drive H&S policies, procedures, and initiatives to ensure the achievement of the stated organisational Objectives.

Both H&S Management Teams will continually monitor the progress and outcomes of H&S policies, procedures, and initiatives to determine and evaluate success against the stated organisational Objectives. Both Teams will ensure intervention and the implementation of corrective actions when potential or actual deviation from or failure to achieve stated organisational Objectives is evident.

A record of achievement against stated organisational Objectives will be produced as evidence of achievement. The success of stated Objectives will form part of the annual H&S Performance Review.

Where appropriate, the Senior H&S Management Team will set Company managers individual H&S Objectives commensurate with organisation 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.

Where Objectives are not achieved in a defined timescale, there will be review of the Objective in terms of being realistic and relevant. Where the Objective still has value, it will be carried forward until ultimately achieved, and with greater emphasis paid to prevent further unacceptable delay.

Organisational Objectives will be primarily, but not exclusively, based upon the following inputs:

- Applicable statutory laws 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, H&S Appointed Person feedback to the H&S Management Team.
- Output from formal H&S Review Meetings.
- Output from avenues of employee and student 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 wellbeing programmes or campaigns.

Organisational Objectives will be based on the following Organisational H&S Priorities:

- Compliance with applicable statutory laws 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 maybe working from home.
- Act in accordance with organisational Values and Behaviours:
 - Put **students first** (but not at the detriment to staff).
 - Be **ambitious** for success.
 - **Deliver** on our promises.
 - Be **curious** about ways to improve.
 - **Huddle** to succeed together.

5.2 Roles, Responsibilities and Resources

The people with key H&S responsibilities are set out in the H&S Management organogram on page 5.

Overall responsibility for H&S in Study Group UK is with the Board of Directors. They have nominated a Board Director with specific responsibility for championing statutory compliance and the implementation of good H&S practice within the Company

The Director with responsibility for championing compliance and good H&S practice will ensure that:

- A H&S Policy and Safety Management System is established, implemented, maintained (by being revised at suitable intervals) and notified.
- Sufficient resources, including the human, financial and technological resources, organisational structure, and specialist skillsets that are essential to establish, implement, maintain, and improve a Safety Management System are available to the H&S Management team, and to the organisation as a whole.
- Roles defining key H&S responsibilities, accountabilities, and delegated authorities to facilitate effective H&S management are allocated and that such roles, responsibilities, accountabilities, and authorities have been clearly documented and communicated.
- Reports detailing the H&S performance of Study Group UK are presented to Board of Directors annually, and otherwise as required by them.

The Director with remit for H&S delivery and the Health & Safety Manager 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. They form the H&S Management Team with the Property Managers North and South.

At Centre level, the responsibility for H&S lies with the Centre Director, Head of Centre or Centre Manager. They are responsible for defining clear responsibilities for the management of H&S within the academic and accommodation premises under their control, and for its implementation. They will ensure the appointment of key H&S roles where applicable and appropriate supervisory arrangements for staff, students, contractors, and visitors. They will be supported in their undertaking by key Company personnel.

Where no Centre Director, Head of Centre or Centre Manager is in post, such as at standalone corporate office premises, the Director responsible for H&S will ensure that a designated Office Manager with H&S responsibilities is in place, acting as the H&S Appointed Person.

All employees irrespective of their position have general legal H&S responsibilities. Employees appointed with specific H&S responsibilities will carry out these roles in so far as they are capable and in accordance with any relevant training they have received.

Employees in positions of control have additional obligations by virtue of their authoritative post, i.e. managerial functions or teachers.

Responsibility for occupational health within Study Group UK, including, but not limited to, workplace stress, harassment, bullying, discrimination, grievance, management of significant change affecting staff, pregnancy, working time and performance appraisal, lies with Human Resources.

Like visitors, students don't have legal H&S obligations. In order to keep them safe whilst in our care, they will be encouraged 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 situation.

For full details, see Annex A: H&S Roles and Responsibilities document.

5.3 Emergency Preparedness

Study Group UK will establish, implement and maintains procedures to:

- 1) Identify the potential for emergency situations.
- 2) Respond to such emergency situations.

In so far as is reasonably practicable, the Company will 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 necessary, as prompted by legislative requirements or the findings of practice or actual events.

6. Implementation and Operation (Do)

6.1 Hazard Identification and Assessment of Risk

To protect the H&S of those in our workplaces, Study Group UK will establish, implement, and maintain processes and procedures for continual hazard identification and assessment of risk, in order to determine necessary control measures.

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.

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, students, 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.

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:

- 1) Elimination
- 2) Reduction controls, by time and / or substitution
- 3) Engineering controls
- 4) Administrative controls, including signage, written procedures, training
- 5) Behavioural controls
- 6) Personal Protective Equipment

The Company requires employees 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 UK will endeavour to provide all staff with training in the principals of risk assessment.

Staff that 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.

Safety Management System arrangements will be established, implemented, and maintained to address the primary workplace hazards, relative to organisational activities, as identified by the process of risk assessment.

6.2 Competence

Study Group UK 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.

Employee job descriptions will detail levels of desired and required competence. Where an employee is lacking in required or desired skills, the Company will have processes in place to identify need and to initiate and support personal development of the individual to achieve organisational competence. Selection of contractors will include an assessment of their capability and capacity to undertake the required works safely.

The Company will formulate central (Head Office) H&S training plans, for all staff and for staff with key H&S responsibilities and will operate central H&S training programmes to deliver the plan(s). Local H&S training plans and training programmes may also exist, on the basis that they are complimentary to central initiatives.

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 current organisational H&S structure, arrangements, roles and responsibilities, and to ensure that all training identified as necessary is delivered and completed.

Relevant training records will be kept relating to any H&S training programme.

Any H&S training programme will take into account and be proportionate to differing levels of:

- Individual responsibility, and
- 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

As a result, training programmes will endeavour to offer a range of learning mediums, to best suit the learning needs and preferences of individuals.

6.3 Communication and Consultation

Each workplace will have a nominated H&S point of contact, which will be an individual with H&S responsibilities. The degree of responsibility will vary and be proportionate to the nature of the site and larger and / or more complex sites may have multiple nominated persons.

As a minimum, details of nominated persons will be communicated in the workplace by being described on the required 'H&S Law' poster that must be displayed.

Study Group UK will establish suitable and sufficient communication and consultation channels to ensure both one and two-way flow of H&S information and concerns between employees, students, visitors, contractors, stakeholders, staff with H&S management responsibilities and Study Group UK as the 'employer'. These channels may be for the purpose of general communication including H&S matters, or purposefully in place to convey matters of H&S.

Examples of such communication and consultation channels are:

- 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
- Union appointed H&S representatives
- Management meetings
- Stakeholder meetings
- H&S review meetings
- Student 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

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

6.4 Documentation

Study Group UK will produce H&S documentation in order to:

- Set out the H&S Policy, Safety Management System and Procedures of the organisation.
- Maintain the 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 organisational 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.

Study Group UK H&S documentation control procedures will require:

- The suitable approval of primary Policy and Standard Operating Procedure documents prior to issue.
- The review, update, and withdrawal of H&S documents as necessary.
- That document ownership is evident.
- That document revision status is evident.
- 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.
- That 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
- That documents are issued and stored in a manner that content remains legible.
- Retention of records in accordance with Data Protection Act requirements

6.6 Facilities and Use of Equipment

To ensure that facilities are fit for occupation and that workplace equipment is safe for use, Study Group UK 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.

Study Group UK will ensure that staff are suitably trained to operate facility systems and workplace equipment safely, as per 6.2.

6.7 Incident Reporting and Investigation

The primary aim of incident reporting and investigation procedures is to identify cause to prevent a reoccurrence of a situation of potential harm.

Study Group UK will establish, implement, and maintain procedures to report, investigate where appropriate and record incidents of a H&S basis and analyse the associated incident data in order 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-conformities.
- 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 takes place where necessary.

Study Group UK will establish, implement, and maintain procedures to report, investigate where appropriate and record incidents of a safeguarding basis. These will be separate to H&S incident reporting and investigation procedures and set out in Safeguarding Policy documents, because of the specific requirements of safeguarding legislation and the non-H&S departmental 'ownership' of safeguarding activities within Study Group UK.

Safeguarding procedures will however recognise where there may be a H&S aspect / deficiency to the incident and ensure that there is interdepartmental communication of and collaboration to address matters of shared responsibility.

6.8 Operational Control

The Company will identify important operations and activities that support the delivery of the H&S Policy and Safety Management System 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.

See Annex B for the Procedures Index.

7. Checking

7.1 Monitoring and Performance Measurement

Study Group 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 organisation.
- Occupational health within the organisation.
- Accident and incidents in the workplace.

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

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

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

Study Group UK will have an annual programme of H&S site audits and will assign dedicated resource to this task. The programme will be delivered by competent persons.

Where appropriate to the departmental risks, 6 monthly or monthly site or departmental H&S tours, checks or inspections will take place.

Monitoring will be implemented, or existing frequency increased where significant non-conformity or incident prompts greater frequency.

The findings of monitoring and performance measurement will be documented and retained for suitable periods of time. 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.

Study Group UK 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.

8. Action

8.1 Non-conformity; Corrective and Preventative Actions

Study Group UK will act on the findings of monitoring and performance measurement. The Board of Directors will ensure that suitable and appropriate layers of management are in place throughout the organisation with the authority to take action to address H&S non-conformity and effect operational change where necessary.

Significant non-conformity will be addressed to:

- Ensure corrective actions is 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 opportunity for improvement of a deficiency
- Ensure RIDDOR reporting of a deficiency takes place where required
- Ensure that workplace risk assessments are reviewed as necessary

Records of actions taken will be made and retained for suitable periods of time.

8.2 Management Review

The H&S Management Team will review the H&S performance of Study Group UK on an annual basis and make an annual submission to the H&S Senior Management Team. The Chief Finance Officer will make the findings of the annual review available to the Board of Directors.

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 H&S based legislation 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

This Review will identify opportunities for improvement, consistent with Study Group UK'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 UK, to ensure its continuing suitability, adequacy, and effectiveness.

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

1	Board of Directors.....	1
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1. Board of Directors

Overall responsibility for H&S in Study Group UK Ltd is with the Board of Directors, who are ultimately accountable for protecting the health and safety of all employees, students, visitors, hired contractors and members of the public from the activities of the business.

- 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 employees. They should ensure that the Policy is implemented within any business area that they have responsibility for.
- They have nominated a Board Director with specific responsibility for championing statutory compliance and the implementation of good H&S practice within the Company.
- They should ensure that suitable and appropriate layers of management are in place throughout the organisation with the authority to take action to address H&S non-conformity and effect operational change where necessary.
- They should support the Board Director H&S Champion by providing adequate and appropriate financial, human, technological and other resources to adequately implement the Policy.
- They should agree an annual H&S Budget to support the planning and undertaking of H&S initiatives by the H&S Management Team.
- They should consider H&S a high business priority and consider the impacts on H&S of any significant business change at the planning stage.
- They should demonstrate commitment to H&S compliance and good standards of H&S practice by their own actions and leading by good example.
- They should require H&S monitoring and performance reports at intervals of at least annually.

2. Directors with specific remit for H&S

Comprising of the Chief Financial Officer and Commercial Operations and Procurement Director, they will collectively with the H&S manager form the Senior H&S Management Team.

The Director (Chief Financial Officer) with responsibility for championing compliance and good H&S practice should ensure that:

- A H&S Policy and Safety Management System is established, implemented, and maintained, in accordance with legal requirements.
- Sufficient resources, including the human and financial resources, organisational structure, specialist skillsets and technology that are essential to establish, implement, maintain, and improve a Safety Management System are available to the H&S Management Team and the organisation as a whole.
- Roles defining key H&S responsibilities, accountabilities, and delegated authorities to facilitate effective H&S management are allocated and that such roles, responsibilities, accountabilities and authorities have been clearly documented and communicated.
- Reports detailing the H&S performance of Study Group UK Ltd are presented to Board of Directors annually, and otherwise as required by them.
- Where Centre Director, Head of Centre or Centre Manager is in post, such as at standalone corporate office premises, a designated Office Manager with H&S responsibilities is in place, acting as the H&S Appointed Person.

The Director (of Commercial Operations and Procurement) with remit for H&S delivery, in collaboration with the H&S Manager, 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.

Together the Senior H&S Management Team should:

- Demonstrate commitment to H&S compliance and good standards of H&S practice by their own actions and leading by good example.
- Be the leading advocates for H&S within the organisation, 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 requiring that H&S is formally discussed and minuted at senior level management meetings.
- Liaise with fellow Directors as necessary, to ensure that adequate financial, human, technological and other resources are allocated to the management of H&S.
- Make recommendations to fellow Directors on health, safety and welfare matters affecting the organisation.
- Set any organisational H&S targets or KPIs.
- Agree / formalise and publish forward the annual H&S Improvement Plan for the organisation.
- 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.
- Seek monthly based 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 employee training are in place to equip employees with the necessary knowledge and skills to undertake their work safely.

3. Health & Safety Manager

The H&S Manager, in collaboration with the 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 a suitable, sufficient, and effective H&S Policy and Safety Management System (SMS) is prepared, maintained and revised so that as a minimum, it meets statutory requirements and is appropriate for 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 evaluating and validating 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 UK 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 practice.
- 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 of 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 UK H&S site, in order to provide easy public access to the documentation forming the H&S 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 organisational 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 (via the Risk Manager) of any incident likely to result in a claim against the Company insurance policies and that where required, report incidents to the H&S regulator in accordance with RIDDOR or equivalent overseas EU statutory requirements.
- To be the primary point of contact within Study Group UK Ltd for any (UK or overseas) H&S regulator.
- To report on H&S management within Study Group UK Ltd monthly.
- In collaboration with the 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.

4. Centre Directors, Heads of Centre and Centre Managers

At Centre level, the overall responsibility for day-to-day site H&S lies with the Centre Director, Head of Centre, or Centre Manager. They will be supported in their undertaking by key Company personnel. They must lead by good H&S example and are responsible for defining clear responsibilities for the management of H&S within the academic and accommodation premises under their control, and for its implementation:

- Primarily to ensure the fundamentals of H&S, these being:
 - Safe and maintained workplace premises, including safe access and egress.
 - Safe workplace equipment.
 - Safe methods for the use, handling, storage and transport of harmful substances (COSHH).
 - Safe systems of work and,
 - Safe workforce through the provision of necessary information, instruction, training and supervision.
- Must 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 affect a safe fire evacuation.
Emergency escape routes remain unobstructed.
 - A Fire Safety Risk Assessment is prepared and maintained, and that Assessment findings (any suggested improvements) are acted upon.
- Must ensure that all workplace facilities and equipment are subject to statutory inspection and testing as required, for example portable appliance testing (PAT), electrical system inspections, elevator system inspections, and air conditioning system inspections.

- Must ensure that it has been determined if the premises contains asbestos and where asbestos is present, that an Asbestos Register and associated Management Plan is prepared and maintained.
- To ensure 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).
- Must ensure that all workplace facilities and equipment display statutory safety signage as required.
- To ensure 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 Law Poster, and the H&S Policy.
- To not allow a charge to be made for any equipment that is necessary to protect health and safety.
- To co-operate and co-ordinate on matters of H&S with any other employers Study Group UK Ltd shares a premises with.
- To ensure that adequate resources and facilities are provided so that the requirements of the H&S Policy can be achieved.
- To establish the necessary organisational 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, a Centre Director, Head of Centre or Centre Manager fulfils this role.
- To establish a suitable and sufficient management structure and workforce complement to ensure safe workplace operations and activities.
- To ensure that all workplace activities are underpinned by a documented system of suitable and sufficient risk assessment, undertaken by competent persons.
- Must ensure 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.
- Must ensure that suitable and sufficient first aid arrangements are in place, determined by a First Aid Needs Risk Assessment.
- If lone working takes place, must ensure that suitable lone working arrangements are in place, with a risk assessment setting out the control measures to be employed.
- To ensure that systems are in place to deliver H&S information, instruction and training to staff, students, contractors, and visitors as necessary.

- To ensure staff, students, 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.
- To ensure that formalised disciplinary procedures are in place, which should be invoked where necessary to reinforce the requirement on the workforce to comply with the H&S Policy and other H&S provisions.
- Have accident and incident investigation, reporting and reporting systems in place and that RIDDOR reportable incidents are identified and reported to the H&S regulator (via the H&S Manager).
- To consult with the workforce over any significant change to their H&S arrangements.
- To receive regular feedback from the site H&S Co-ordinator 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.
- Where a Centre operates without a designated H&S Co-ordinator or H&S Appointed Person, the role undertakings fall to the Centre Director, Head of Centre, or Centre Manager.
- To seek advice from the H&S Manager on all H&S matters beyond their familiarity and technical competence.

5. Other employees in a position of control

E.g. Directors or Heads of brands / departments / operations, Managers and Supervisors/Property Managers

Employees in positions of control must lead by good H&S example and have additional obligations to that of 'all' employees by virtue of their authoritative post, i.e. directive and managerial functions or teachers:

- To ensure that workplace areas under their control are adequate with respect to health, safety and welfare and that appropriate safety signage is clearly displayed as necessary.
- To ensure that workplaces and work equipment under their control are adequately checked and defects or deficiencies are reported and rectified. To ensure that the findings of any departmental safety audit or inspection are documented, circulated and acted upon as appropriate.
- To ensure that any equipment used by workforce under their control is fit for purpose and safe to use. Must ensure that display screen equipment (DSE) Users receive information, instruction and training in the use of this work equipment and that a workstation assessment is completed for the DSE user.
- Ensure that work activities under their control are undertaken in accordance with any safe working procedures that apply.
- Ensure personal awareness of the provisions of the H&S Policy and that these are being implemented by the workforce under their control.
- Ensure that the workforce under their control are aware of and are given adequate access to the H&S Policy, and that they are informed of any changes to it.

- Ensure that suitable and sufficient task based and COSHH risk assessments for work activities under their control are carried out by competent persons and significant findings are documented. Risk assessments must also be subject to review at appropriate intervals.
- To ensure their own personal familiarity with risk assessments applicable to the workforce / department / curriculum / area under their control; ensure familiarity with the hazards and risks relating to work activities areas under their control and of the control measures required to reduce the risks.
- To ensure that the significant findings of risk assessments are conveyed to relevant persons in the workforce under their control.
- Must only accept young persons (U18) into the workplace under their control where a Young Person risk assessment has been completed.
- Must ensure that a Maternity risk assessment is completed for an individual under their control when they formally notify their employer of pregnancy.
- Must ensure that a Personal Emergency Evacuation Plan (PEEP) is completed for any individual in the workplace under their control, who could have difficulty evacuating from the building quickly (in the event of a fire alarm) without the use of a lift.
- To ensure that the workforce and other persons under their control are properly supervised, have received suitable and sufficient information and instructions to be present in the workplace and carry out any work activities safely and where necessary, are sufficiently competent to carry out work activities safely. In the case of contractors, to ensure that they are employed in accordance with Contractor Management Safe Operating Procedures.
- When workforce under their control will undertake work at the premises of another employer, to ensure that the other employer will provide Study Group UK Ltd staff with suitable and sufficient H&S protection and welfare arrangements.
- In the case of the workforce under their control, to arrange for any additional staff training to address any identified skill deficiency posing a safety risk. To ensure that the workforce under their control attends / undertakes and completes any relevant or required H&S training and is given sufficient time away from normal duties to complete H&S training.
- To ensure that suitable protective clothing, safety equipment and manual handling aids are available where appropriate to the workforce under their control, and that it is correctly used and where necessary, maintained.
- To require the workforce under their control to make accident and incident reports and forward incident reports on to those in a position to take the necessary remedial action, and the site H&S representative.
- Must not allow any significant hazard or deficiency that could cause serious harm reported to them to remain.
- To ensure that when formal departmental / team meetings take place within the workforce under their control, that due regard to H&S matters is given and documented (in Meeting Minutes).
- To invoke formalised disciplinary procedures as necessary, to reinforce the requirement on the workforce under their control to comply with the H&S Policy and other H&S provisions.
- Seek to engage the workforce under their control with matters of H&S.

- To seek advice from the H&S Manager on all H&S matters beyond their familiarity and technical competence.

Teaching staff (relative to students)

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

6. Health and Safety Coordinators

Primarily in place to support and assist the respective Centre Director, Head of Centre, or Centre Manager with the management of H&S at the local site level. Duties include:

- To support and assist the respective Centre Director, Head of Centre, or Centre Manager with their H&S responsibilities.
- To support and assist other employees in a position of control with their H&S responsibilities.
- To co-ordinate and enable H&S arrangements, which may involve multiple buildings across a single 'site'.
- To 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 conduct workforce consultation as necessary.
- To 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.
- To identify weaknesses in primary H&S Policy and Safe Procedures and bring these to the attention of the H&S Manager.
- To 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 remediation of any deficiencies or defects found.
- To 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.

- To 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.
- To give guidance on potential risk assessment control measures, such as the selection of available and suitable protective clothing, safety equipment and manual handling aids.
- To 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 within the workforce.
- To make H&S based communications and disseminate important H&S information to the workforce as necessary; any H&S Notice Board must be kept current and free of non-H&S items.
- To 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.
- To advise on the selection of suitable contractors; ensure that contractors are employed in accordance with Contractor Management Safe Operating Procedures and that Approved Contractors are recorded and made known. To assist with review of contractor Pre-Qualifying Questionnaire returns as required and ensure that contractor presence on site and the work of contractors is subject to supervision.
- To ensure 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.
- To ensure that general building repair and maintenance works do not take place unless asbestos controls are in place where necessary.
- To compile a monthly Accident and Incident Report for the site and submit this to the H&S Manager (via email to 'ukhands').
- To be the site point of receipt of Incident Reports and to 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.
- To promptly bring any serious or RIDDOR 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.
- To ensure that local emergency plans exist and are maintained.
- To ensure 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.
- To ensure that a programme of suitable and sufficient H&S training is in place for the workforce 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.

- To ensure that all persons (staff, students, contractors and visitors) coming onto site receive an appropriate induction to the workplace, detailing emergency procedures.
- To attend and contribute towards H&S Committee or Review meetings as required.
- To provide regular and routine feedback on matters of H&S to the respective Centre Director, Head of Centre or Centre Manager.
- To 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.
- To act as the liaison conduit between the respective Centre Director, Head of Centre or Centre Manager and the H&S Manager.
- To liaise with and work collaboratively with any H&S Appointed Person in post.
- To seek advice from the H&S Manager on all H&S matters beyond their familiarity and technical competence.
- To demonstrate good H&S practice and to 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).
- To proactively keep personal H&S technical competence current.

7. Health and Safety Appointed Person

Primarily in place to support and assist the respective Centre Director, Head of Centre or Centre 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, on the basis of the site being small and / or a shared premises, where responsibility for site H&S is shared with a host premises, potentially akin to the more administrative based nature of a School Bursar role, or where a H&S Co-ordinator is also in post; must liaise with and work collaboratively with any H&S Co-ordinator in post.

8. Other employees with specific H&S responsibilities

E.g., First Aiders, Fire Marshals, and H&S Representatives.

Should carry out their H&S duties in accordance with any respective (First Aid / Fire Evacuation) policy, job description or legislative governance (H&S Representative).

9. All employees

All employees, 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 which 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.
 - To refrain from 'horseplay' and the abuse of welfare facilities.
 - 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 UK Ltd premises. This will entail supervision of the 3rd 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 wilfully 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 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 UK Ltd, 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 concerning themselves 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 discharge of a fire extinguisher to the Facilities team (for replenishment).

10. Students

Although students don't have a legal obligation under the Health and Safety at Work etc Act, in order to keep them safe whilst in our care, we must encourage them to take health and safety seriously and help them understand their own responsibilities for complying with safety rules and procedures, as well as any instructions given for the purpose of their safety or in an emergency situation.

Students will be instructed and encouraged to:

- Be responsible for their own health and safety, and that of their fellow students.
- 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, or any faulty equipment, or other safety defects evident.

All students should follow all health and safety information and instruction that is conveyed to them, through induction sessions, booklets / handbooks, notice boards, signage, verbally and any other means of communication.

If there is any aspect of health and safety, information and instruction that is not understood, a student must ask for clarification. It is the responsibility of Study Group UK Ltd to create an environment where students 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
COVID -19 Policy and Guidance
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