

The JGA Group

Health and Safety Policy and Procedures



Policy

In accordance with the Health & Safety at Work Act 1974 ("the Act"), the JGA Group ("the Company") has the maintenance of Health & Safety at Work as a declared objective. This document details the Company's Group Health & Safety Policy ("the Policy").

To fulfil this objective, the management of the Company shall take all reasonable and practicable precautions to safeguard the Health, Safety & Welfare of team members, customers/learners and members of the general public who have access to or contact with premises or activities which are directly under the Company's control. The Company shall comply with legal Health & Safety requirements as a minimum standard and approved Codes of Practice where applicable.

To comply with this Policy, the Company has established the following structure of accountability:

- Overall responsibility for Health & Safety matters rests with the Managing Director.
- All team members have a responsibility and statutory duty to take reasonable care for the Health & Safety of themselves, learners and others who may be affected by their acts or omissions and are also required to co-operate with the Company in enabling it to discharge its statutory duties under the Act.
- All managers are responsible for health & safety within their respective areas of the Company's premises and, where their remit extends to oversight of offsite activities, the health & safety provisions obtaining in respect of those activities.
- A trained Health & Safety Consultant shall provide advice where required.

In furtherance of the Policy, the Company undertakes, in so far as is reasonably practical, to:

- Provide and maintain premises, equipment and systems of work that are safe and without risks to health. Ensure employees are aware of risks and responsibilities when working from home, and help to make any reasonable adjustments where necessary.
- Make arrangements for ensuring safety and absence of risks to health in connection with the use, handling, storage and transport of articles and substances.
- Implement the requirements of the Education and Skills Funding Agency and the HSE to ensure learners understand the importance, principles and practices of Health & Safety.

The JGA Group

Health and Safety Policy and Procedures



- Identify and take steps to eliminate any risks or hazards which might compromise health or safety and, in particular, hazards that could be a risk to vulnerable learners with physical, hearing, sight or other impairments.
- Provide such information, instruction, training and supervision as is necessary to ensure the Health & Safety at Work of team members, customers/learners and visitors.
- Maintain any place of work or learning under the Company's control in a condition that is safe and without risks to health and to provide and maintain means of access and egress that are safe and without such risks to vulnerable people.
- Provide and maintain a working/learning environment for team members, learners, customers and visitors that is safe and without risks to health and is adequate as regards facilities and arrangements for their welfare.
- Provide such protective equipment as is necessary for the Health & Safety at Work of employees and customers/learners.
- Encourage team members and learners to set high standards of Health & Safety by personal example.
- Ensure compliance with the Policy by regular review of practice using risk assessment checklists.
- Regularly update team members on the Policy through Team Briefings, bi-annual Team Forums, and circulars/newsletters.
- Monitor the effectiveness of Health & Safety provisions, in consultation with team members at the aforesaid Team Briefings and Team Forums.
- Keep the Policy under regular review ensuring, inter alia, that it continues to meet current legislative requirements, and duly publish any amendments that may result on a timely basis.

All necessary measures shall be taken to ensure observance of the Policy compliance with which the Company considers essential for the well being of its team members, customers/learners and visitors, plus the efficiency of its operation.

The Policy requires team members and (where applicable) customers and learners to:

- Take reasonable care for themselves and other persons (for example colleagues, freelancers, customers/learners, visitors to offices or training venues) who may

be affected by their work or study, particularly bearing in mind those who may be more vulnerable (for example, wheelchair users or those with sight impairment).

- Cooperate towards providing a safe place and system of work. This may include wearing protective clothing, taking part in fire drills, or using safety equipment.
- Neither interfere with nor misuse anything provided in the interests of Health & Safety at Work.
- Bring to the attention of management any faulty or defective equipment or plant etc, or any health or potential safety hazard of which they are aware.
- All accidents, injuries and dangerous occurrences (this includes “near misses”) must be reported and recorded using forms included in the Accident Book. The H&S Coordinator must be informed as soon as possible via team member, learner, tutor, coach or team manager, so that he may initiate investigation and notify the appropriate authorities. Incidents covered by the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR) must be reported to the RIDDOR Incident Contact Centre (ICC). When an accident involves a learner on any ESFA-funded programmes, the Education and Skills Funding Agency must be informed. The Education and Skills Funding Agency must also be informed if JGA becomes aware of a learner fatality that occurred when not involved in any learning activity.
- Acknowledge and accept that failure to comply with the Policy may be considered a matter grave enough to warrant formal disciplinary action

Implementation of the Policy: Head Office and Training Venues

- Employees, advisers, or delivery team delivering programmes must be fully conversant with the provisions of the Head Office and Training Venue risk assessments and are responsible for properly briefing participants in these provisions. This includes Covid-19 risk assessments where applicable. The process for these risk assessments is described at Annex A. Team members must also be fully aware of the principles and requirements of the Safe Learner Concept as detailed at Annex B.
- In keeping with the Safe Learner Concept, learners participating in such programmes must be made fully aware of the importance of Health & Safety at induction and of the risk assessment for that venue. They shall receive embedded learning about the principles and practices of good Health & Safety observance during their programme. They shall also be encouraged to report on any Health & Safety issues that might arise.

The JGA Group

Health and Safety Policy and Procedures



- The team responsible for each programme shall have specific responsibility for monitoring these procedures and ensuring they are observed.
- Where the Company Lone Worker Policy is applicable, both the worker and the Company team responsible must comply with its provisions in Annex C.

Implementation of the Policy: Outreach Services

Further to the Head Office and Training Venue implementation requirements above, the Policy has additional implications for Company activities away from its premises:

- Where Company programmes are held away from Head Office, the team responsible must ensure the proprietors of the premises where they are held have Health & Safety provisions compliant with the Policy in place. The team manager is to request a copy of the landlord's premises risk assessment and shall also carry out a Training Venue risk assessment, using the procedure and checklist described at Annex A.
- When employers are being considered for a learner work placement (work experience, work trial, work placement or Apprenticeship), the team manager responsible must ensure that the potential employer has in place Health & Safety provisions compliant with this Policy. The procedure and checklist for approving work placements are described at Annex A.
- Although Apprenticeship and vocational qualification (VQ) programmes contain some group workshop activities, the majority of assessor, tutor, coach and verifier contact with the Apprentice or learner is on a one-to-one basis at the candidate's workplace. The team manager shall assure the safety of the workplace on behalf of our employee and the Apprentice/learner. The team manager will also assess the vulnerability of the learner in a one-to-one learning situation and take the necessary steps to reduce the risk to the Apprentice/learner. To protect our customers, and particularly vulnerable learners, all assessors, tutors, coaches and progress quality advisers shall be DBS checked at enhanced level. Details of the policy and procedure for initiating DBS checks are at Annex D. To protect our team members, they are to be made aware of the Policy for Lone Workers at Annex C.
- Career Services advisers delivering IAG and other services are also, in the main, operating on other people's premises in a one-to-one learning situation. Similar steps to the VQ requirement above at Annex A must therefore be taken to ensure both physical and personal safety, especially for vulnerable learners. Therefore, to protect the customer, and in particular vulnerable learners, all Company IAG advisers shall be DBS checked. Details of the policy and

procedure for initiating DBS checks are at Annex D. To protect our team members, they are to be made aware of the Policy for Lone Workers at Annex C.

Implementation of the Policy: A Conducive Environment

- Team members and learners are encouraged to suggest ways of improving Health & Safety and of raising awareness within the Company. Health & Safety shall be included on the agenda of the weekly management group meetings, regular departmental team meetings, Team Briefings and the bi-annual Team Forums in order to keep this at the forefront of our minds and actions.
- Risk Assessments shall be carried out whenever new premises are being considered and reviewed at least annually and whenever changes are made to the working/learning environment (for example, reconfiguration of offices).
- Instructions regarding emergency procedures in case of fire are posted in the Company's offices, included in the induction for all team members and at the beginning of training courses (these instances being recorded in writing), and regularly re-stated.

Implementation of the Policy: Quality Assurance

The Company shall ensure that the practices arising from this Policy achieve the objectives laid out above. Performance in the Health & Safety area shall be measured, so that achievement can be reviewed and action taken to improve performance against the standards set by the Health & Safety Act and the Education and Skills Funding Agency.

Guided by the HSG65 (Successful Health and Safety Management), the essential ingredients of the JGA quality assurance system for Health & Safety are as follows:

- A proactive Health and Safety Management System designed to promote a continuous improvement culture.
- Direct involvement of all stakeholders: learners, employers, tutors, assessors, coaches, administrators, and managers.
- Risk assessments of locations and learner specific circumstances e.g. work placements.
- Feedback and monitoring returns at all levels.

The JGA Group

Health and Safety Policy and Procedures



- Continuous programme of management spot checks, reviews and audits that inform the H&S Action Plan and periodic Self Assessment Reports.

Details of the Health & Safety quality assurance system are shown at Annex E.

Final Statement

The Managing Director has overall responsibility for Health & Safety and for ensuring that appropriate planning and provision of resources are available to meet requirements. The Health & Safety Coordinator is the first-line contact in respect of Health & Safety issues. All employees, freelancers and learners share in creating and operating in a safe environment.

Richard Goodwin
Managing Director

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Policy Owner	Susan Prestridge, Operations Director

List of Annexes:

- A. Risk Assessment
- B. Safe Learner Concept
- C. Policy for Lone Working
- D. Health & Safety Quality Assurance Process

Annex A

Risk Assessment

Definitions

Control Measure	An action performed to eliminate a hazard or reduce it to an acceptable level.
Hazard	Anything that may cause harm, such as chemicals, electricity, working from ladders, an open drawer etc.
Placement	When the Company brings together an Apprentice or learner and an employer for the purpose of work experience over a specified time interval.
Risk	The chance, high or low, that somebody could be harmed by a hazard, together with an indication of how serious the harm could be.
Risk Assessment	A careful examination of what could cause harm to people, so that it can be determined whether enough precautions have been taken or that more are required to prevent harm.
Workshop	A classroom-based activity involving presentation and IT equipment only, as necessary.

Introduction

A risk assessment is an important step in protecting the business, freelancers, employees, learners and visitors, as well as complying with the law. It helps us to focus on the risks that really matter – the ones with the potential to cause real harm.

In many instances, straightforward measures can readily control risks. For example, ensuring spillages are cleaned up promptly so that people do not slip, and cupboard drawers are kept closed to ensure people do not trip. In most cases it means that simple, cheap and effective measures can be used to protect the most valuable asset ... the workforce, and the most important ... learners and visitors.

The law does not expect all risks to be eliminated, but we are required to protect people as far as is 'reasonably practicable'. Moreover, the Education and Skills Funding Agency requires us to secure proper facilities for the training and education of the people that it funds.

"Proper facilities" include at least satisfactory health & safety standards that meet legal requirements and the needs of learners. Therefore, we will include the requirements highlighted within the Safe Learner Concept to ensure that the needs of all of our learners are met.

Risk Assessment Principles

- Identify hazards.
- Assess the risk that each hazard will cause harm.
- Eliminate the risk where possible.
- Where the risk cannot be eliminated, determine and apply control measures, eg. Covid-19 risk assessments and safety measures.
- Reassess the remaining risk.
- Decide whether the risk is acceptable.
- If not acceptable – cease.
- If acceptable:
 - Inform/train all people that might come into contact with the hazards
 - Continuously monitor to ensure that all control measures are applied correctly
 - Reassess if anything changes

Risk Assessment Requirements

There are five distinct types of H&S Risk Assessment involved in the work done by JGA:

- a. JGA as an employer.
- b. Training Venue Location Risk Assessment.
- c. Workshop Risk Assessment.
- d. Work Placement, including apprenticeships.
- e. Lone Worker (eg. IAG advisers or Apprenticeship assessors & coaches and Tutors).

There are two distinct types of learning activity:

- a. Classroom courses/workshops.
- b. One-to-one activities, such as IAG, Apprenticeship and other similar activities.

To capture all necessary information we use three checklists:

1. Employer HS01 Health & Safety Checklist
2. Health & Safety – Risk Assessment Checklist for JGA venues
3. Health & Safety – Risk Assessment Checklist for other outreach venues

Risk Assessment Process

In the case of Head Office, Harrow, HSE office-based assessment is completed annually.

In the case of a Placement, HS01 checklist shall be completed.

The JGA Group

Health and Safety Policy and Procedures



For outreach venues where only workshops are held, HS02 shall be completed.

All tutors/freelancers must be supplied with a reference copy of the completed Health & Safety Risk Assessment Checklist for the training venue being used. The copy must be signed and dated by the Team Manager and Competent Person.

The tutor/associate must verify the contents of the supplied Health & Safety Risk Assessment Checklist on the first day of the training programme.

In the event of the tutor/associate not having a copy of the completed Health & Safety Risk Assessment Checklist for the training venue on the first day of the training programme, the tutor/associate must carry out a health & safety risk assessment and complete a checklist.

Thereafter, the tutor/assessor must check the health & safety status of the venue at the start of each visit, to assess if there has been any change since the Risk Assessment was issued or the venue last used. A record should be kept of this review on the workshop attendance sheet. A separate Covid-19 Risk Assessment will need to be carried out where appropriate.

Responsibilities

It is the responsibility of the Manager of each training course or project to ensure that the risk assessment forms have been completed. When the forms have been completed, they shall be passed to the H&S Coordinator who will be responsible for ensuring that the H&S Competent Person countersigns the forms. If for any reason the H&S Competent Person feels that there is insufficient or ambiguous information presented, either the form will be returned to the Manager for corrective action or it will be clarified and corrected by the H&S Competent Person as required. Where forms are returned to a Manager, the H&S Coordinator shall be informed.

It is the responsibility of the H&S Coordinator to monitor this process and provide reminders - for example, by means of monthly reports giving the risk assessment status of outreach venues used by each team (see sample report below).

It is the responsibility of the Manager to repeat all assessments at least every twelve months or when anything changes, if sooner.

Annex B

Safe Learner Statement

There are six key inputs required by those training in order that the learner can develop their health, safety and welfare knowledge and awareness.

- The working environment
- Initial assessment
- Learning plan
- Supervision
- Information, instruction & training
- Reassessment

The Statement is designed to help learners to understand the principle that good practice in health, safety and welfare is an integral part of the learning experience.

Learners are entitled to:

- A safe, healthy and supportive environment, wherever learning takes place.
- An induction to health and safety when starting your learning or training and at each new location or placement.
- Full information on the JGA (and where appropriate, the work-placement employer's) health and safety policy, responsibility and procedures.
- Information on supervision arrangements.
- Information on any risks associated with the learning programme.
- Advice on free access to suitable Personal Protective Equipment (PPE) or facilities.
- Information on restrictions, which apply to any action or activity on the part of the Learner, for example restrictions on the use of certain machinery or vehicles.
- Training on health and safety issues and appropriate use of equipment.
- Advice that, in the event of an accident at work, non-employed learners on an Apprenticeship programme may claim disability benefit through the Department for Work and Pensions (DWP) and/or Analogous Industrial Injuries Scheme (AIIS).

Learners are safe learners if, through the quality of the learning experience, they:

- Become risk aware.
- Gain an understanding of the importance of health and safety.
- Understand how to identify hazards, how to assess risks and the principles behind control measures.
- Develop a set of safe behaviours, which they take with them through their working lives.

Annex C

Policy for Lone Working

INTRODUCTION

Who are lone workers and what do they do? Lone workers are those who work by themselves without close or direct supervision. They are found in a wide range of situations.

People in fixed establishments where:

- Only one person works on the premises.
- People work separately from others.
- People work outside normal hours.

Mobile workers working away from their fixed base:

- Practitioners visiting domestic and commercial premises or other outreach locations.
- Practitioners who have to meet strangers in a remote location.

Working alone can introduce or enhance hazards e.g. lack of assistance if needed, first aid cover, emergency situations, violent attack etc. There are inevitably tasks where team members work by themselves, and often lone working may occur in the evening and at weekends.

What is the Law?

Can people legally work alone? Lone working is not illegal. However, certain requirements must be satisfied before such an arrangement is practised.

Relevant Legislation

- The Health & Safety at Work Act 1974 ss.3 & 4 requires all employers to provide safe environment, safe equipment, and safe systems of work, including those who work alone.
- The Management of Health & Safety at Work Regulations 1999 requires all employers to carry out Risk Assessments. This includes assessments of the particular risks associated with lone working.

POLICY

The JGA Group acknowledges there may be an increase in potential risks associated with lone working, and requires all such work to be subjected to Risk Assessments and sensible controls to minimise the risk.

The Policy applies to all venues and all team members who are recognised as lone workers.

Managerial Responsibility

It is the responsibility of each JGA Team Leader, or designated person, to implement the JGA Group Policy and ensure the Policy meets the individual needs of team members as required.

Risk assessments are required under Reg. 3 of the Management of Health & Safety at Work Regulations 1999.

Risk assessments are to be undertaken to select the appropriate action to be taken to minimise the risk.

Ensure that all team members will be provided with information, instruction and training as appropriate in order to minimise risk when working remote from colleagues or other persons and/or outside normal working hours.

Implement and monitor Policy in relation to its application and ensure that it is complied with taking appropriate action if the Policy is not complied with.

Ensure that copies of the Lone Working Policy are available and accessible to team members.

PROCEDURAL GUIDANCE

Risk Assessment

Where significant hazards exist, risk assessments of work activities shall be undertaken to comply with the Management of Health & Safety at Work Regulations 1999. Where those work activities are likely to be undertaken by a lone worker or outside normal working hours, these factors should be considered in the assessment. It may be the case that by merely working alone, out of hours, risks are introduced even for a non-hazardous work activity that had not previously been subject to a formal risk assessment.

Particular consideration shall be given to:

- Assessing if the work is a “one-person job”.
- The remoteness or isolation of the workplace.

- Any problems of communication.
- The possibility of a risk of violence.
- Emergency egress (e.g. are fire exits open after hours?).

Control Measures

To address the additional risks (if any) identified in relation to a lone working situation, JGA team managers shall introduce control measures to eliminate or minimise the risks.

Such control measures may include:

- The need to authorise team members to work alone and/or out of normal working hours.
- Risk assessment of the work area to ensure provisions for emergencies are in Place, i.e. escape routes open, fire fighting and first aid equipment.
- Personal safety monitoring system.
- Provision of communication equipment.
- Periodic check-in arrangements or visits by other team members.
- Information and training.

The control measures will vary depending on the type of work, location, experience of the worker and local conditions.

Assessment Records

It is the responsibility of the assessor to ensure that an Assessment Review date is set following the assessment and that this date is clearly documented on the Risk Assessment Form.

Responsibilities of Team members

All team members have a responsibility to take reasonable care for their own safety whilst conducting lone working tasks.

It is the responsibility of all team members to follow this Policy, and follow the guidance where provided.

SPECIFIC OUTREACH PROCEDURES FOR LONE WORKING

- Check telephone calls must be made on arrival and departure and periodically in between to your Team Administrator/Team Manager.
- All lone workers must complete their Site Health & Safety Checklist, on the first day of the training programme. Even if the tasking team supplies a reference copy of an existing and completed copy of the Checklist for that venue, the Associate must verify its contents on arrival at the venue.

The JGA Group

Health and Safety Policy and Procedures



- Any serious non-compliance must be phoned in immediately to the JGA Operations Director.
- The Site Health & Safety Checklist must be sent through to your Team Manager as soon as is possible.
- Any concerns with regards to your own health and safety (including violence as defined in the Health & Safety at Work Act) must be brought to the attention of your Team Manager who, where it is warranted, will refer the matter to the Operations Director and/or Managing Director for appropriate action.

Annex D

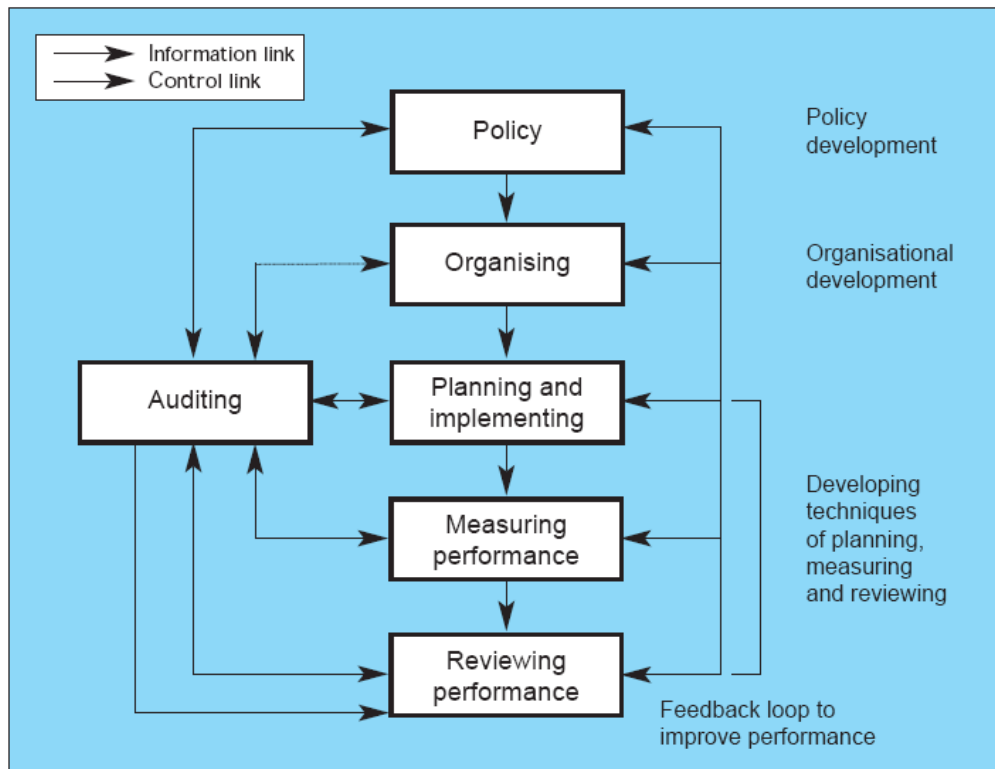
Health & Safety Quality Assurance Process

The JGA Group (the Company) needs to ensure that the practices arising from this Policy achieve the objectives set, in an appropriate and effective manner as required by the Health & Safety Act 1974 and the Safe Learner Concept.

Guided by the HSE (HSG65 - Successful Health & Safety Management), the essential ingredients of the Company quality assurance (QA) system for Health & Safety are as follows:

- A proactive Health & Safety Management System designed to promote a continuous improvement culture.
- Direct involvement of all stakeholders: learners, employers, tutors, assessors, administrators, and managers.
- Risk Assessments of locations and learner specific circumstances e.g. work placements.
- Feedback and monitoring returns at all levels.
- Continuous programme of management spot checks, reviews and audits that inform the H&S Action Plan and periodic Self Assessment Reports.
- Audits shall be chaired by the JGA H&S consultant. Any proposed changes to the H&S Action Plan will be discussed and agreed by the JGA Management Group.

Figure 1: Key elements of successful health & safety management – from HSG65



A prerequisite of every effective system is that Quality Assurance is built into the foundation of that system. Health & Safety is no exception to that rule.

The way that JGA achieves the requirement and the primary contributors to the QA process are summarised in the table below. The three sections of the table refer, in essence, to the "Planning", "Implementing" and "Reviewing/Auditing" components of the diagram above with "Measuring performance" being carried out throughout the process.

Please note that the term "**feedback**" in the table refers to the information required for performance measurement, monitoring and review.

The JGA Group

Health and Safety Policy and Procedures

	Management	Administrators	Tutors/Coaches	Learners
Pre-Delivery phase Also periodically ongoing for long running programmes	Risk Assessments	Team members consultation/contribution to Risk Assessments		
	Action Plan	Admin System preparation	Course preparation – inclusion of Safe Learner elements	
	Review and Sign Off			
	Management “go-ahead”			
Delivery phase	Session and Admin spot checks	Admin feedback. Collate. Analyse. Summarise.	Induction checklist Session checklists. Review learner feedback. Provide Tutor feedback. Session paperwork sent to administrators	Induction feedback
	Feedback reviews			Session feedback
	Review Contract Requirement Changes			
	Adjust H&S Systems when necessary	Implement adjustments		
			Inform learners of adjustments (illustration of H&S System in practice)	
Post-Delivery phase Also periodically ongoing for long running programmes	Formal Audit	Admin feedback. Collate. Analyse. Summarise.	Course feedback	Course feedback
	Update SAR and QIP			

Each Team Manager is responsible for selecting the H&S objectives and measurements, specifying who creates them, and ensuring that they are achieved. Each Team Manager is also responsible for obtaining the agreement of the Company’s H&S Competent Person prior to the commencement of the delivery phase.

The Team Managers will be supported by the H&S Coordinator, who will maintain project H&S records, measurements, reviews and action plans, remind them of time critical events, and organise the support of appropriate specialist team members, such as the H&S Consultant.

The H&S Consultant is a qualified and competent H&S specialist and acts as an adviser to JGA on H&S matters. He also chairs the JGA H&S audit team and is responsible for conducting a H&S audit periodically and at least annually.

Management oversight of the QA process will be the responsibility of the Operations Director and Managing Director.

The H&S Coordinator is responsible for creating a monthly point brief on H&S matters for the Operations Director to be completed prior to the monthly Team Briefing. The point brief should summarise H&S occurrences during the last month, include proposals for Team Briefing H&S issues or training, and forecast future concerns.

The H&S Coordinator is also to make a quarterly written report on H&S management information to the Managing Director. The report should include summaries of auditable data so that problems can be anticipated.

H&S Performance Measurement (Learners)

Because of the varying nature of the courses delivered, the required level of learning and understanding will vary between courses. However, in principle, the following will be delivered for each course:

- All learners will undergo a H&S induction to ensure they gain a basic understanding of the importance of H&S. This will include identification of hazards, assessing the risk they represent and what can be done to control such risk(s).

Measurement: The tutor and learner(s) will be required to complete and sign an induction checklist to confirm that this learning has taken place. This evidence must be produced for 100% of learners.

- All courses will have H&S learning embedded within the syllabus. This will normally be provided in the form of workshops covering specific aspects of H&S. This ongoing learning is designed to reinforce the importance of H&S, and to develop the expectation of high levels of H&S standards. The learners will be expected to play an active part in H&S, gain related transferable skills, and to identify and learn safe behaviours.

Measurement: This will be measured in reviews.

- All courses have learner feedback forms, each of these contain questions on the provision of H&S. These forms will be analysed and used to monitor and improve H&S at the delivery venue. This gives the learner another route to actively participate in H&S. Feedback will be required after induction, during and at course end.

Measurement: 100% of learners will be expected to complete these feedback forms.

All related H&S evidence will be collated by the administrators of the respective course(s). This information will be summarised, on a monthly basis, in a way that it can be effectively used and analysed by the H&S Coordinator to facilitate continuous improvement.

H&S Performance Measurement (Team members)

Because JGA deliver vocational and job-related training, a high level of H&S knowledge is required of JGA team members. To ensure that these standards are maintained, the following is in place:

- Each member of team members receives a specific H&S induction. This session is evidenced by the signature of the new team members.

Measurement: There will be a record of H&S induction for all team members.

- All team members attend the monthly Team Briefing. The latest H&S standards / news is presented and those present are encouraged to discuss/report H&S issues.

Measurement: The names of team members present and the subjects of discussion are recorded in the meeting minutes.

- All team members take part in ongoing H&S training, for example Fire Escape and Evacuation drills.

Measurement: A record will be kept of all such training and the success rate for attendance will be monitored. The requirement will be for all team members to attend all events. The H&S Coordinator will organise additional events to ensure 100% training coverage of team members.