



Health and Safety Policy

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Scope

This document sets out the arrangements for Total People to ensure continued compliance with health, safety and environmental legislation and regulations relating to all aspects of training provision including apprenticeships, traineeships, adult learning and 16-19 provision.

The management system is aligned to ISO 45001 which enables the Business to control risks and improve performance. It supports the organisation to achieve the intended outcomes through the Management System, which provides value for Safety, Health, and Environmental, the company and interested parties.

Intended outcomes

- Senior leadership, commitment, responsibilities, and accountability
- Senior leadership developing, leading, and promoting a culture that supports the intended outcomes of the Management System
- Communication, consultation and participation of employees and their representatives
- Effective process for identifying hazards, controlling OH&S risks, and taking advantage of opportunities to improve processes and reduce business risk.
- Prevent or mitigate adverse and enhance beneficial environmental impacts.
- Enhance customer's satisfaction.
- Continual performance evaluation and monitoring of the Integrated Management Systems to improve our Health, Safety and Environmental performance.
- Ensure our objectives align with our policies and take into consideration our hazards, risks, and opportunities.
- Compliance with its legal and other obligations.

Introduction

Total People will ensure necessary preventative controls and resources, including time, personnel, equipment are made available to implement this, Policy. The Company also recognise the need to effectively communicate our Policy and ensure our employees, apprentice/learners, contractors, and visitors are competent to fulfil health and safety roles and responsibilities.

The effective delivery of this Policy also requires each employee, apprentice/learner, contractor and visitor to accept responsibility for their own health and safety and that of others and to collaborate and cooperate where applicable.

Definitions

- Company means Total People
- Learners means all apprentices, trainees, adults, or other individual on a Total People programme.
- Processes means Processes, Procedures, Guidance and Templates.
- Site means a location where work is being carried out and includes all company premises, including third party premises where our people, apprentices/learners may be working or learning. In such circumstances employees have dual responsibility for compliance with remote-working policies of the Company whilst abiding by local policies active in third party premises.
- SHE means Safety, Health, and Environment.
- Worker means person performing work or work-related activities that are under the control of the Company.

- Works means the tasks undertaken in support of the execution of a contract by the Company.

Roles and Responsibilities

The purpose of this document is to outline the top-level management structure and provide adequate detail regarding the relevant responsibilities for each management tier.

Board of Governors

The Total People Board of Governors carry ultimate responsibility for health and safety and for ensuring that the company allocates sufficient resources in terms of staff, training, and funding to fulfil its legal obligations. Their principal responsibilities include:

- Approve objectives and targets, ensuring they take account of stakeholders.
- Monitor and evaluate performance against objectives.
- Approve Health and safety Policy.
- Conduct an annual review of Health and Safety Performance.

Managing Director

Accountable to Board of Governors for:

- Implementation of Health and Safety Policy
- Monitoring performance
- Has executive authority to set specific health and safety policy.
- Agree performance standards for management of health, safety, and welfare matters.
- Where responsibilities are shared, ensure coordination and cooperation.
- Ensure communication channels are present to resolve matters or allow escalation to leadership.
- Appoint health and safety champions to oversee implementation of health and safety policy.
- Provide clear and visible leadership on health and safety matters Challenge unsafe and unhealthy behaviours.

LTE Risk and Compliance Team

Accountable for promoting a positive health and safety culture throughout the Company by:

- Communicating conditions, practices or arrangements for health, safety and welfare at work that may expose others to risk or cause harm.
- Conducting initial and on-going full site inspections / audits (using safety culture software) as per central audit schedule.
- Sharing any corrective actions with relevant staff and managers, monitor and report on the completion of corrective actions.
- Conduct internal audits to monitor effectiveness of H&S practices, reporting back to relevant managers and the Head of Learner Experience regarding strengths, actions and recommendations.
- Keep an up-to-date asset register to ensure that existing or new equipment is identified and information provided to facilities to ensure that all statutory inspections are carried out in line with regulatory responsibilities.
- Provide advice, guidance, and training to managers across TP / MOL in relation to SHE requirements, legislation, and best practice.
- Attending health and safety LTE meetings.

- Assisting with the investigation of potential hazards, dangerous occurrences, and complaints; and examine the causes of accidents in the workplace.

NB: None of the above functions impose any duties on Safety Representatives.

Facilities Team:

Accountable for promoting a positive health and safety culture throughout the company by:

- Ensure all required statutory inspections are completed and records maintained in line with relevant legislation and guidance.
- Maintaining a centralised tracker for equipment inspections in line with relevant legislation.
- Share copies of relevant statutory inspections / checks with relevant managers in TP / MOL, enabling these to also be held in Health and Safety site folders.
- Monitor and report on corrective actions and repairs required to ensure buildings are maintained to the correct standards and in line with all relevant legislation, working with relevant managers across Total People / MOL.

Directors and Heads of Business Areas:

- Provide clear and visible leadership on health and safety matters.
- Ensure that health and safety arrangements are implemented.
- Ensure that employees, apprentices/learners, contractors, and visitors receive health and safety training.
- Ensure that colleagues are held accountable for health and safety performance (the same management standard is applied to health and safety matters as to other management functions).
- Monitor and review health and safety performance within area of responsibility.
- Agree health and safety objectives and targets with line management.
- Health and safety matters are considered when planning and budgeting.
- Seek advice on health and safety matters, concerns, or areas of best practice.
- Deputise for line manager where required.

Operation and Curriculum Managers:

- Provide clear and visible leadership on health and safety matters.
- Ensure employees under direct line management / supervision:
 - receive health and safety training.
 - are set health and safety objectives and targets are held accountable for health and safety performance.
- Verify:
 - Tasks, work environment, tools and equipment are risk assessed (note risk assessments are completed for any activity that carries risk and for any / all educational outings – RA are completed using the LTE template and must be signed off by 2 managers.)
 - Health and safety arrangements are implemented.
 - Communicate health and safety information, including:
 - Performance against objectives and targets
 - Known hazards and their controls
 - Roles and responsibilities.
 - Monitor the health and safety performance of department.
 - Challenge unsafe and unhealthy behaviours.
 - Include health and safety performance as an agenda item at all meetings.
 - Suspend activities where employee or apprentice/learner safety or health is likely to be compromised.
 - Consider health and safety requirements when business planning and budgeting.

Teaching Staff:

Accountable for health and safety performance across their area of responsibility. They shall:

- Communicate control measures in place for minimising risk to colleagues, apprentice/learners, contractors, and visitors.
- Complete behavioural observations, inspections, and audits.
- Report potential concerns, incident reports and accidents promptly.
- Suspend activities where safety, health or the environment is being, or is likely to be compromised.
- Ensure that:
 - work is being carried out in accordance with specified controls.
 - activities involving risk to the safety, health or well-being of employees, apprentice/learners and others are appropriately risk assessed and controlled.
 - effective arrangements are in place for responding to emergency situations, providing first aid and reporting incidents.Inform their line manager of any dangers or shortcomings in the health and safety arrangements, even if there is no risk of immediate danger.

Technicians, compliance officers, premises and support staff

Accountable for health and safety performance across their area of responsibility. They shall:

- Follow control measures implemented to minimise risk to employees, apprentice/learners, visitors, and contractors.
- Participate in the completion of behavioural observations, inspections, and audits.
- Report all potential concerns, incident reports and accidents promptly.
- Inform their line manager of any dangers or shortcomings in the health and safety arrangements, even if there is no risk of immediate danger.
- Ensure programmes for statutory testing of equipment such as local exhaust ventilation, pressure systems, portable appliances and lifting equipment etc. are carried out.

All employees

Employees have a responsibility to look after their own health and safety and that of others with whom they are working. All employees shall:

- Always work safely.
- Ensure work areas do not create hazards for themselves or others.
- Report any concerns, incidents or learning opportunities immediately.
- Complete all induction and health and safety training.
- Not misuse, disable or interfere with any equipment provided to protect people from hazards or to control risk.
- Assess risk and implement controls prior to the completion of a task or activity.
- Use personal protective equipment correctly.
- Assist in the investigation of injuries, incidents and near misses.

Employers of Apprentices and Learners

- Provide a safe, healthy, and supportive environment for the apprentice/learner.
- Ensure that health and safety arrangements are implemented and that the work environment, tools and equipment are regularly risk assessed and monitored within the workplace.
- Provide apprentice/learners with effective supervision, training, information, and instruction.

- Suspend activities where an apprentice/learner safety or health is likely to be compromised.
- Ensure apprentices/learners employed by you and under your direct supervision:
 - Receive health and safety training.
 - Understand their roles and responsibilities.
 - Are held accountable for health and safety performance.
 - Challenge unsafe and unhealthy behaviours.
- Reporting:
 - Notify Total People immediately of an incident/accident / ill health or a Health and Safety incident whilst the apprentice is at their place of work (place of work being their normal place of work or third-party premises) with full details of the incident/accident/ill health being sent to the relevant Learning Coach / manager. The Learning Coach / manager will ensure all details are reported directly to the Risk and Compliance team via the TopDesk internal service.

Apprentices and learners:

All Apprentices and learners are responsible for looking after their own health and safety and that of others affected by their academic and leisure activities. Apprentices/learners have the following specific responsibilities:

- Comply with all policies, guidance and procedures which are in place to control health and safety risk as well as risk to wellbeing.
- Ensure that their activities do not present unnecessary or uncontrolled risks to themselves or to others.
- Attend appropriate induction and training.
- Report any accidents, unsafe circumstances, or work-related ill-health.
- Not interfere with any equipment provided to protect people from hazards.
- Where an apprentice/learner is not confident of their ability to complete a task or leisure activity safely, inform the tutor person in charge of the activity rather than compromise their own safety or the safety of others.

Contractors:

Total People have a duty under the Health and Safety at Work Act 1974 to provide a safe environment for contractors working on Group premises, or premises controlled by the Company. Contractors must be informed of all relevant or emergency procedures in order that they are able to take the correct action in an emergency. Where there are known hazards, these should be clearly communicated to contractors for inclusion in their risk assessment process.

- Ensure the Contractor has received a site induction, which includes:
 - emergency procedures.
 - site specific risk assessment and method statement
 - permit to work etc.
 - access arrangements.
 - welfare facilities:
 - PPE.
- Ensure no work commences without the Risk Assessment & Method Statements and certificates of competency to carry out the work.
- Contractors are required to:
 - provide a description of their method of work so that there is an effective dialogue on safety issues before work commences.
 - ensure no work commences without risk assessment and method statements.
 - Ensure no work is completed without the assurance of competency

- Ensure no tools are used that have not been suitably certified i.e. Portable Appliance Tested, Harness Inspections for working at Height etc.
- ensure required information is recorded (Contractor name, project description).
- Complete the Permit to Work.

Visitors:

- Visitors to premises owned or controlled by the Company have a responsibility to look after their own health and safety and that of others with whom they come into contact.
- They must comply with warning signs and reasonable health and safety directions and instructions given to them by their host.
- Visitors are expected to inform their host of any accidents or unsafe circumstances of which they become aware.

Arrangements

An 'Organisation's Health and Safety Review' form must be used to help determine that the employer can provide a safe, healthy and supportive environment in which the apprentice/learner will receive training. This review **MUST** be carried out before an apprentice/learner commences training and monitored and reviewed regularly thereafter. Part 1 completed and submitted PICsWeb. **See Appendix 1 for details.**

Where learners are under the age of 18 or under 25 with an EHCP and either employed or completing a placement as part of their training then a **Health, Safety and Well-being Young Person Assessment** must also be completed prior to them commencing training. (Part 2 – completed and submitted via PicsWeb). **See Appendix 1 for details.**

Note – part 1 and 2 are subject to validation checks by the relevant administration team when starts are processed into the system. A new starter cannot be added to the system without both part 1 and 2 being fully completed.

There is a partnership agreement built into the Health and Safety Review. This agreement becomes operative from the learners first day in placement / learning.

The Partnership agreement with the employer comprises:

1. Provide 'on the job training' as agreed with the Training Adviser and detailed on the Job Description/Risk Assessment.
2. Adhere to the Health and Safety at Work Act 1974 and The Management of Health and Safety at Work Regulations 1999.
3. Have a Health and Safety Policy which includes a written policy statement where there are 5 or more Employees).
4. Have assessed risks and put in place control measures to prevent or reduce (recorded for 5 or more employees).
5. Have made adequate arrangements for dealing with accidents and incidents including the provision of first aid (the employer to notify Total People Ltd immediately of all RIDDOR / Non RIDDOR reportable accidents and occupational diseases involving apprentice/ learner(s)/ young person(s).
6. Provide apprentice/learner(s) with effective supervision, training, information, and instruction.
7. Provide and maintain suitable and appropriate equipment and machinery which is safe and without risk.
8. Have planned for the provision and use of the necessary personal protective equipment.
9. Have planned for fire and any other foreseeable emergencies.

10. Provide a safe and healthy working environment.
11. Manage Health and Safety.
12. Manage apprentice/learner(s) / young person(s) health, safety and welfare (the employer has assessed the risks to any apprentice/learner / young person taking account of his / her age (inexperience, immaturity etc.) and any other special needs or circumstances including any disability and / or medical / health condition).
13. To provide induction training during the first day with particular attention to Health and Safety.
14. To nominate an employee/mentor who shall be responsible for the apprentice/learner's health, safety and welfare.
15. To operate a policy of Equality of Opportunity in relation to apprentice/learners.
16. To take an active role in the 'on the job' training process as agreed on the job description / risk assessment form.
17. Ensure Employers Liability insurance is current and other insurances is in place, as appropriate to the business undertaking.
18. To allow Total People Ltd staff onto the premises for monitoring purposes.
19. Any 'Actions to be Implemented' detailed in the attached Development Plan will be addressed within the timescales indicated.

As part of the apprenticeship sign up, employers are entering into a legal agreement, the apprenticeship training plan outlines the following points in relation to employers' health and safety responsibilities.

- Must undertake any legal and contractual responsibilities for Health and Safety of the Apprentice.
- Must provide the Apprentice with an induction into the Employer.
- Must record the hours and any changes to working patterns of the Apprentice each week.
- Must notify the Provider immediately if the Apprentice has a change of work circumstances. A change of circumstance would
 - include but not be limited to reduced hours of work, the Apprentice becomes self-employed, made redundant, resigns or has a
 - break in learning due illness or other personal reasons.
 - Must notify the Provider immediately if the Employer ceases to trade.
- Must ensure that you have read Total People's policies (Safeguarding/PREVENT, Data Protection, Equal Opportunities) and Health & Safety) before the start of the Programme—which can be found on the Total People Website - <http://www.totalpeople.co.uk/our-policies/>
- Will cooperate with, and participate in, the training of the Apprentice by the Training Provider, ensuring that the academic standards of the programme are supported and fulfilled. These responsibilities include, but are not limited to:
 - allocating a Workplace Mentor to support the Apprentice, to facilitate and support learning in the workplace;
 - where applicable, engaging in assessment activities, and
 - full and reasonable participation in programme and progress reviews.

Reporting and Recording Health & Safety accidents, Incidents, ill health, and concerns.

All accidents/incidents and near misses must be reported and recorded. If any member of staff has had an accident/incident or has witnessed / been made aware of an accident/incident regarding an apprentice/learner, they must immediately report this via Top Desk – **see appendix 2 for details.**

Please Note: Top Desk is the single and central electronic reporting system for any / all accidents, adverse incidents (for example fire drills) and near misses. Accidents to anyone – staff, learners, visitors, contractors MUST be reported immediately (as soon as is reasonably practical) via this system. If there are any technical delays with this system then alternatively accidents, incident or near miss details can be sent to the centrally manned email box. Please note this is a backup system only, but like the Top Desk system is managed by the Risk and Compliance Team.

Reporting accidents, incidents and near misses is fundamental to the ongoing review and evaluation of our Health and Safety practices.

All tickets raised on Top Desk are actioned and allocated by and between members of the LTE Risk and Compliance team, who will take any appropriate action that may be needed, this may involve an accident/indecent investigation.

In the event of an accident/incident happening whilst the apprentice is at their place of work (place of work being their normal place of work or third-party premises), Total People will need to be notified immediately by the employer and/or the apprentice/learner with full details of the accident/incident being recorded and sent to the relevant Learning Coach and or manager. The Learning Coach / Manager is responsible for reporting to the Risk & Compliance Team immediately via the Top Desk system.

If any member of staff, apprentice/learner has a health and safety concern, the information is recorded. The SHE team are available to provide information, advice, support, and guidance as required to ensure that any concerns are mitigated and rectified. This may include follow up visits/testing as deemed necessary.

In the event of ill health whilst the apprentice is at their place of work (place of work being their normal place of work or third-party premises), Total People will need to be notified immediately by the employer and/or the apprentice with full details being sent to the relevant Learning Coach / Where a specific illness may require specialist advice then the relevant LC / manager can seek advice from the SHE Team, again this can be reported and support requested via Top Desk. Total People will continue with regular communication throughout the period of ill health or until the apprentice is recovered providing any information, advice, and guidance along with any support for both the apprentice and the employer.

The employer is responsible for the health and safety of its employees and Total People recognises that it has an important role to play in ensuring the health and wellbeing of its apprentices and learners.

Promoting and gaining Commitment to the Policy

Total People will ensure that this Health & Safety Policy is promoted and commitment via the following activities. This is not an exhaustive list, as other mechanisms will be used as and when the situation arises.

This policy will be agreed by the Total People board of governors with promotion and commitment to this policy gained through:

- Staff Induction/Training/CPD/Online learning modules (Thrive)
- Intranet section on Health and safety, and what it means for staff and apprentices/learners. [Safety, Health, Environment and Risk - Home](#)
- Visible media in and around office and employer locations.
- Learning resources for all apprentices and other learners.
- Learner progress reviews.

We will ensure that we measure the promotion and commitment within Total People to this Health & Safety Policy by:

- Monitoring the outcomes from online and interactive training for both staff and apprentices/learners
- All staff will be asked to read and sign to say they have understood the Health and Safety policy as part of the annual H&S Update course on Thrive.
- Apprentices and learners undertaking work experience will complete a Health and Safety induction checklist with the employer / placement provider and this will be held on OneFile (Apps) or PICS (Study Programme). Reports enable Total People to track completion.
- Managers will produce evidence (e.g. meeting notes) staff training and 1-2-1 reviews, that this policy has been discussed.
- Monitoring of apprentice/learner review documentation
- Monitoring specific responses to Health & Safety in apprentice/learner and employer surveys
- Through our use of internal Health and Safety checks and reviews and through audits checks

Policy Awareness, Implementation and Training

Colleagues

- Mandatory training module as part of colleague induction
- Refresher mandatory training on an annual basis
- Read and understand this policy at induction (confirmed through colleague induction checklist) and following a policy review.
- Reminders and CPD at regular all colleague briefings
- Documents available on the Company Intranet
- Notice board in all delivery sites.

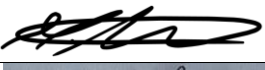
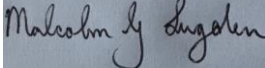
Health and Safety is a standing agenda item at Total People board meetings. The Deputy MD and or The Head of Learner Experience work in partnership with the Risk & Compliance team to report required information at these meetings.

Total People work in collaboration and consultation with colleagues relating to Health and Safety where relevant and possible. In addition, where significant changes are made or where any changes are deemed to have a detrimental impact on colleagues then following policy approval from the board, Total People would ensure these changes were shared appropriately with recognised Unions. For TP and MOL these are Unison and UCU? In addition, Total People's Health and Safety Policy is published externally within the policy section of our website.

This Policy applies to all those working in, learning at, or visiting Total People, including apprentice/learners, staff, governors, volunteers, and visitors, including contracted services such as agency staff, employers offering work placements, employers employing apprentices, transportation companies, contractors, and subcontractors with direct access to young people and vulnerable adults.

Signatures and review

This policy will be reviewed annually. The review date of this policy may be brought forward if there are any changes in legislation, national or local guidance before this date that are relevant to this policy. The policy will be communicated to all colleagues via I-Learn as well as being published on the Hub, on the Total People website and in the staff e-booklet issued on offer of employment.

Approver:	Melanie Nicholson	Managing Director Total People	
Board Approver:	Malcolm Sugden	Chair of Total People Board	
Version:	Version 4.1		

Appendix 1: Health and safety on-boarding process

This process applies to all learners / apprentices that are employed or on a placement as part of their programme.

The health & safety employer check (part 1) is completed with all employers and placement providers before a learner can start training with Total People.

This process is used to satisfy Total People that the employer / placement provider has assessed associated risks for apprentices / learners and has sufficient risk management arrangements in place. The employer has primary responsibility for the Health and Safety of students.

Step 1 – H&S Employer Check - part 1

All employers to have a H&S part 1 in place before a learner can be signed up onto programme (per employer every 3 to 5 years decided by risk rating)

- Can be completed remotely.
- Completed at head office site.
- For sales starts - completed by sales team.
- For operational starts - completed by LC.

*Form can be sent to employers to help them prepare for remote visit with Sales or LC. Sales / LC **must complete discussion with employer and ensure sufficiency and accuracy of information.***

NB: Part 1 invalid = Employer – change of ownership / major re-development of premises / change of premises / no employer contact for 6 months/ serious accident or H&S incident.

Step 2 – Health, Safety and Well-being Young Person Assessment- part 2

- Completed for all Apprentices under 18 and under 25 with an EHCP, completed for all Study Programme learners on a placement.
- **To be completed at the employer's premises with the learner and employer, can be completed live online if the employer premises has been visited by the LC in the last 3 months.**
- PicsWeb form submitted with the start.
- Reviewed by learner, employer, and LC at first review.

Step 3 – Learner Induction (employer) - part 3

- Completed via OneFile.
- Completed for every learner who is employed or on a placement.
- Checked by LC this has been completed at first review.

Step 4 – Learner Induction (workshop) - part 4

- Completed via OneFile.
- Completed by all learners who attend practical workshop training at a TP workshop, and to be completed on or before the training begins (RAC / Scaffolding / Automotive and Engineering)

Occupational Areas – Risk Rating:

Occupational Employer Environment	Risk Rating
Engineering	High
Scaffolding	High
Refrigeration and Air conditioning	High
Automotive	High
Hospitality	Medium
Management, HR and Professional Services	Low
Childcare	Low

Revisiting of Part 1

- High risk bandings – every 3 years
- Medium risk bandings – every 4 years
- Low risk bandings – every 5 years

Progress Reviews:

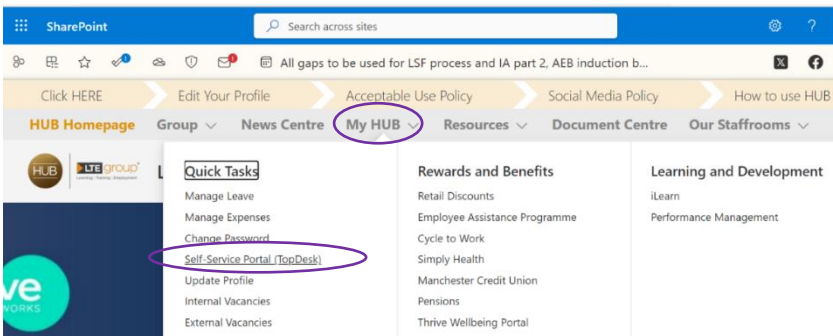
Progress Reviews incorporate regular reviews / updates relevant to learners' health and safety following on from the onboarding and induction process, they provide opportunities to build on learner's knowledge and check their understanding in relation to health and safety and their job role. Progress Reviews are tri-party reviews between Total People, the learner and employer and must include contributions and involvement from the employer. Total People favour a blended learning approach to delivery and therefore it may be appropriate to complete remote reviews. However, where learners are working in high-risk industries reviews are planned to take place at employer's premises wherever possible. Where learners are working in **high-risk industries** the following applies

- Under 18 or under 25 with an EHCP all reviews will be completed at the workplace
- For all other learners at **least**, every other review will be completed at the workplace.

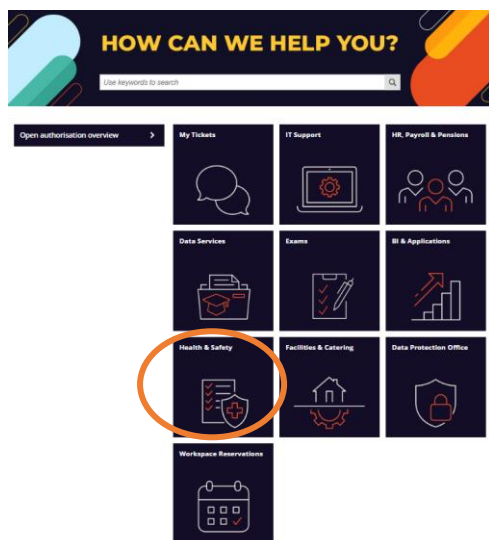
Appendix 2 - Accident Reporting:

All accidents or near miss accidents that happen in the workplace or at a Total People site must be reported electronically as per LTE requirements. Any Total People colleague can report an accident or near miss. The Curriculum Performance Managers (DSPs) and Health and Safety manager / SHE Team are available for support and guidance in relation to reporting and responding to accidents. Any Total People colleague can report an accident or near miss via the Top Desk system.

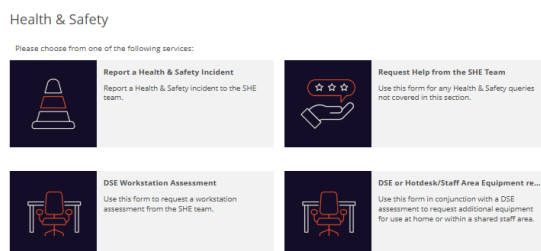
Visit the Hub, this can be accessed via phones. **My Hub / Self Service Portal** (Top Desk) [Home Page - Self-Service Portal](#)



Select report a SHE incident.



Select the best fit category for your concern / report.



Complete the record and click submit.

