

HEALTH, SAFETY AND RISK MANAGEMENT POLICY



Policy Group: Health & Safety and Environment

Effective: May 2025

Approved: The Board

Responsible Officer: Steve Williams, Head of Risk

Next Renew Date: May 2026

Ref no: 2.1



GUIDANCE

Vision

Transform lives through learning

Values



PASSIONATE - We are passionate about inspiring young people, adults and our Purple People to be their best and we take pride in creating a positive learning environment to fulfil their potential.



UNSTOPPABLE - We are unstoppable in our quest for the pursuit of excellence. We are dedicated and resilient to develop ourselves and our learners.



RIGHT - We treat each other with respect and strive to do the right thing through insight, inclusion, honesty, growth and trustworthiness.



PARTNERSHIPS - We support the people surrounding us in our everyday lives, building effective partnerships with businesses, learners and all stakeholders where we can pass on our knowledge and skills to help them meet their goals.



LEARNERS - Learners are at the centre of everything we do and we are driven to provide life-changing and life-long learning for them.



EMPOWERED - We encourage our Purple People to be independent and autonomous to maximise their goals surpassing their barriers and targets. Feel it, believe it, live it.

Tone of voice

Our tone of voice takes its direct influence from our core values. We are passionate about people and learners and are driven to get the best out of everyone by understanding them. We are caring and supportive, as well as being determined and striving for growth. We talk with purpose and enthusiasm in a way that connects and empowers people.

Innovation is at the heart of Learning Curve Group and we're always thinking about what's next!

SUMMARY CHANGES

Date	Page	Details of Amendments
May 2020	Whole Document	Annual review, inclusion of new acquisitions and addition of company car driving section
June 2020	Part Review	Additions to reflect safety measures taken during a pandemic
May 2021	Whole Document	Annual review
May 2022	Whole Document	Annual review
May 2023	Whole Document	Annual review
May 2024	Whole Document	Annual Review and adjustments updates for risk management.
May 2025	Whole Document	Annual Review and adjustments updates for risk management.

INTRODUCTION

Learning Curve Group (LCG) is one of the largest national training providers in the UK, providing education and training nationally. All companies within the LCG family uphold the same company Vision, Mission and Core Values and follow our group policies and procedures.

Here at Learning Curve Group, we truly stand by our vision that learners are at the centre of everything we do. This Health, Safety and Risk Management (HSRM) Policy document forms the framework by which we manage our health, safety and business risks and associated legal requirements for our colleagues and learners across all sites.

HSRM is a process which provides assurance and designed to enable LCG to ensure that:

- minimise the likelihood and consequence of the threat of risks and health and safety incidents.
- maximise the likelihood and benefit of taking opportunity risks through prioritised and targeted risk mitigation to ensure efficient and effective use of resources.
- objectives at all levels are more likely to be achieved.
- damaging events are less likely to occur.
- beneficial events are more likely to occur.
- LCGs approach to HSRM supports the Directorate in determining actions for prioritisation.
- The approach is aligned to the development and delivery of LCG's strategy, strategic objective planning.
- Supports AIR (Accident Incident Rates) for LCG across the group.

Applies to

This policy sets out the means to achieve and maintain adequate standards of HSRM at work across our business and applies to all Learning Curve Group employees, colleagues, freelancers, contributors, temporary and casual staff, wherever they are directed to work, and will also apply to all business departments.

It is the responsibility of all our managers to ensure the health and safety controls, and safe systems of work are in place and safe systems of work are implemented to ensure the safety of all employees, colleagues, learners and others, visitors, contractors, and the general public who may be affected by our activities under their control.

Each manager must take responsibility for ensuring that all activities are risk averse so far as reasonably practicable, from active sessions/activities as part of academy programmes/delivery, office work, online activities and contracting resources, sub-contracting as well as any procurement for the business.

Reason for policy

The management of HSRM must be integral to our work and consequently, this policy will be closely linked with other Learning Curve Group policies and guidelines. In reviewing or devising any guidelines affecting work activities, or business risk, this policy should be considered.

This policy is supported by a series of subject-specific health and safety policies/procedures, Codes of Practice, and Guidance Documents, Financial, Contract policies, risk management registers and BCP (Business Continuity Planning).

This policy is in accordance with the Health and Safety at Work Act 1974 and all other relevant legislation, and it applies to all Learning Curve Group employees, sites, and activities.

This policy and procedure do not form part of your terms and conditions of employment and can be changed at any time as we deem appropriate or if policy must be amended due to legislation updates/changes.

HEALTH AND SAFETY POLICY STATEMENT

This policy is in accordance with the Health and Safety at Work Act 1974 and all other relevant legislation, and it applies to all Learning Curve Group (LCG) sites and activities. The Chief Executive is responsible for ensuring policy formulation and development, and that it is implemented throughout the organisation by the operational management teams.

LCG demonstrates our commitment to a safe working environment through its Directors and Senior Managers, who fully accept responsibility for the health and safety of our colleagues, learners and the public who may be affected by our activities. The Company will ensure that adequate resources and time are available to carry out this policy and monitor its implementation.

This policy is implemented by active cooperation of all colleagues through the process of hazard identification. Effective implementation of this policy will contribute to improved business performance by the setting and reviewing of objectives, which are set against improving safety performance. Compliance with legal requirements is considered as a minimum level to be achieved and we will seek, through a programme of continual improvement, to achieve higher than regulatory standards.

The continuing development, education and training of colleagues will be a key activity in the implementation of our HSRM systems. Adequate resources will be committed to ensure that HSRM objectives are achieved.

The Company recognises the importance of consultation with colleagues and will implement a communication system to encourage active participation in improving HSRM and in their implementation of the arrangements outlined in this policy.

This policy statement must be communicated to all colleagues. It will be reviewed at least every twelve months or if changes are made due to deficiencies highlighted by a review, new legislation or by business development, with any revisions being further communicated to all employees.

“Our aim is to achieve a safe workplace, reducing likelihood of accidents, within all areas of Learning Curve Group and have a culture that is risk averse in all activities and in particular ensuring safety first always.”

Signed:

A handwritten signature in black ink, appearing to read 'Brenda McLeish', written over a white rectangular background.

Brenda McLeish OBE DL
Chief Executive Officer

RISK MANAGEMENT STATEMENT

LCG will manage risk effectively and in a consistent framework in all aspects of its business including planning, delivering, operating, and overseeing programmes and performance, and including any external contracts.

All management levels will develop and encourage a collaborative culture of well-informed risk-based decision making.

This Policy is part of our internal control and governance framework. It outlines our approach to risk management, including the role of management, important aspects of risk management processes, and reporting procedures; and describes how LCG will evaluate the effectiveness of our internal control procedures.

LCG encounters numerous risks that could affect any aspect of its business, and these risks are captured in our overall business risk register held on our Business Continuity Plan; these can be academic, administrative, or commercial business activities and it recognises that the management of risk is vital to ensure LCG is able to achieve its operational aims and strategic registers objectives.

Given the uncertainties faced by unforeseen and sometimes external factors, it is helpful to identify and address risks.

We aim to achieve a consistent approach towards risk across the group and define the responsibilities of senior managers and outlines risk assurance and risk management processes.



Brenda McLeish OBE DL
Chief Executive Officer

POLICY

Guiding Principles

For Learning Curve Group to be successful in achieving its Health, Safety and Risk Management (HSRM) aims, it must work towards the following key principles:

Commitment - Managers at all levels of the organisation will demonstrate personal leadership and commitment to HSRM within the business.

Line Management Ownership and Responsibilities - Ownership, accountability, and responsibility for matters of HSRM will be embraced by line management and cascaded throughout their management structure.

Knowledge and Skills - All colleagues and contractors will be competent to perform their work safely and will be required to apply good practice in HSRM.

We are committed to providing a safe and healthy place to work while ensuring that our colleagues and others are not placed at any unnecessary or unacceptable risk by our activities. We will strive to:

- prevent accidents and ill health to our colleagues and others affected by our work, including learners, contractors, members of the public and business associates.
- adopt a recognised health and safety management systems business model.
- ensure health and safety is integral to all line management processes and decisions.
- establish a culture that supports the control of risk by promoting active personal involvement, safe behaviour, teamwork, and co-operation.
- reduce health and safety risks through the continued development of a systematic assessment approach.
- continuously and cost effectively improve our health and safety arrangements and performance.
- Manage business risks through a set of controls to include and link into our group risk management registers, which also link into our overall BCP (Business Continuity Planning).
- Ensure that within the controls on the risk register security is a key part of the overall control, from managing site security to data, contract as well as financial risk management.

Risk management is the planned and systematic approach to identifying, analysing, evaluating, and treating risks at all levels of the organisation.

HSRM involves determining the acceptable level of exposure to risk, which enables the achievement of LCG objectives whilst achieving a balance between the level of risk exposure and the cost of mitigating actions.

Risk management involves:

- Considering activities in each area or within LCG.
- Identifying the risks involved (internal and external) in pursuing these activities.
- Assessing the risks for probability and impact.
- Eliminating those risks that can and should be eliminated:
- Where appropriate reducing the likelihood or potential impact of remaining risks with appropriate controls in place.

- Developing contingency plans in case those remaining risks become a reality.
- Considering whether risks may be transferred by insurance or other contract (When using outside agencies, paying for use of their facilities and activities, run and covered by them and under their public liability insurances).

Strategic risks – risks that affect the business/group as a whole and the delivery of strategic objectives.

Tactical risks – risks related to achieving functional objectives.

Operational risks – risks that are related to the delivery of departmental operations.

Strategic programmes and their project outcomes – risks associated with, usually, time limited activities and medium- to long-term delivery of benefits.

Managing Risks

- Effective arrangements will be in place to ensure that risks are assessed and that arrangements are implemented which lead to safe and healthy activities, safe environment, equipment, and plant.
- Business planning will address the control of HSRM and ensure that resources are allocated according to risk priorities.
- Change (organisational or operational) will be managed to consider and adequately control any health and safety implications that may arise.
- Managers must ensure HSRM applied in all aspect of the business activities as per our risk management registers covering all aspects of recognised business risks.

Communication, Cooperation and Coordination

- Activities with third parties (e.g., contractors, suppliers, business associates, partners, and joint ventures) will be effectively controlled and coordinated with clear allocation of accountability and responsibility within managers job roles and PEPs.
- Arrangements will be in place to exchange information on risks and the arrangements for their control with all applicable parties.
- Arrangements will be in place to ensure adequate communication and consultation with colleagues.

Continuous Improvement

- Safety performance, including compliance with statutory requirements and the implementation of this policy, will be measured, monitored, and reviewed on an ongoing basis.
- Continuous improvement will be maintained through the application of systems that ensure our health and safety performance is monitored and measured objectively, and that timely preventative and corrective actions are taken where required.

These principles apply across all our business areas. They create an effective framework to maximise the contribution of all colleagues whilst recognising that HSRM is a line management responsibility.

Through a systematic approach, it supports our commitment to ongoing improvement in our HSRM arrangements.

Responsibilities

To ensure that this policy is successfully managed within the organisation, the following responsibilities have been allocated across the organisation:

Chief Executive Officer (CEO)

In practice, the governing body's responsibilities in relation to HSRM are discharged through the CEO who shall provide leadership and direction by:

- Demonstrating the board's commitment to HSRM and leading by example.
- Being responsible for ensuring that this policy is implemented across the company.
- Ensuring the board and the company receive competent HSRM advice where required.
- Ensuring all colleagues, including the board (as necessary), are sufficiently trained and competent in their HSRM responsibilities and that adequate resources are available to meet the requirements of this policy.
- Ensuring that the workforce, particularly safety representatives, are consulted properly on HSRM matters and that their concerns are reaching the appropriate level, including (as necessary) the board.
- Ensuring that systems are in place to assess the organisation's risks and that sensible control measures are established and maintained.
- Ensuring audits and inspections are undertaken to inform the Senior Management Team about operational performance.
- Ensuring the board and Senior Management Team receive regular health and safety performance data and reports on injuries and work-related ill health.
- Ensuring any proposed changes in working arrangements that have significant implications for health and safety are brought to the attention of the board.
- Ensuring appropriate board-level review of HSRM.

Director of People

The Director of People will:

- Ensure that the company's HSRM Policy is observed across all areas.
- Ensure that all facilities, resources, and requirements necessary for effective compliance with the policy are provided for.
- Ensure that any learning environments outside the company premises are assessed for health and safety suitability, prior to the learning programme taking place.
- Instigate disciplinary procedures (in compliance with our disciplinary rules) where failure to achieve the safety regulations, company safety policy and where poor safety practice is evident with lack of Safe Systems of Work (SSW).
- Ensure that safe conditions are maintained across all buildings and that periodic safety audits and inspections are carried out.

Directors/Senior Managers

Directors/Senior Managers will:

- Ensure that all colleagues under their direct control always implement safe working practices with SSW while carrying out Learning Curve Group undertakings.
- Ensure that all new colleagues under their control are competent in their respective vocational areas and are appropriately trained on an ongoing basis to maintain this

competency, ensuring that ongoing information, instruction, and training is given to all colleagues where required.

- Ensure that all colleagues involved in the production and maintenance of health and safety records within their respective departments keep such records up-to date and available for inspection.
- Action any safety reports and/or correspondence concerning operational areas under their supervision in conjunction with the Director of Performance and Development and the Head of Risk for HSRM if required.
- Ensure that appropriate health and safety assessments, vetting and statutory requirements are carried out for any properties under their control; this includes employer premises and other training provider locations where delivery is in partnership.
- Ensure that any equipment, plant, and substances that are used for company undertakings are suitable for the task and are in good working condition, including the regular maintenance and servicing of plant and equipment.
- Ensure that an up-to-date statement of the company HSRM Policy is brought to the attention of all colleagues and that a copy is readily available at all locations under their control.
- Ensure that the safety responsibilities of new colleagues are communicated to them as part of their induction.
- Ensure all military premises (for the military provision within the Army Reserve Centres (ARCs) follow the orders of the Ministry of Defence and the Commanding Officer SHEF (Safety, Health Environmental, Fire) requirements.

Head of Risk

The Head of Risk will:

- Monitor legal documents, statutory registers and insurance certificates that are kept on our premises and ensure that the necessary statutory abstract notices are displayed.
- Provide competent advice and guidance on all HSRM matters to the Board, Chief Executive Officer, Directors, Senior Managers, and all other colleagues when required.
- Ensure that all accidents and incidents are properly recorded, reported, and investigated, including the production of any internal reports, highlighting recommendations to the board and Senior Managers where appropriate.
- Report any RIDDOR reportable accidents to the relevant authorities within the required timescales, including liaising with any external agencies if required (the funding provider incident reporting requirements will be followed for RIDDOR events involving learners).
- Ensure that all colleagues, contractors, learners, and visitors are made aware of safety procedures.
- Take further, immediate, and appropriate steps to investigate and rectify any risks to health and safety arising from any LCG work activity.
- Inform the relevant Director, in writing, of any HSRM issues that require attention.
- Report to the Executive Team twice yearly, detailing health and safety performance, recorded accidents and actions required.
- Chair the Health and Safety Committee and report back to the Director of People on actions arising from the group.
- Provide ad hoc HSRM training when required by colleagues to ensure that the company's undertakings are not put at risk.
- Assess and advise on HSRM training needs for delivery and assessment with colleagues.
- Promote and participate in health and safety initiatives and activities as required.
- Monitor subcontractor safety procedures and policies relating to the safety of learners.

- Ensure all learners have been provided with their entitled information regarding health and safety.
- Advise management and colleagues on all aspects of health, safety and welfare relating to learners, to ensure compliance with the safe learner blueprint.
- Provide training and advice on the completion of the vetting process, risk assessment and other required topics.
- Oversee the preparation of operating procedures for pre-military outdoor activities.
- Schedule risk assessment activity and individual learner risk assessments as required.
- Monitor the maintenance of statutory records, reports, and notification procedures.
- Prepare statistical information relating to learners' health, safety, and welfare.
- Ensure statutory maintenance and testing is carried out in every learning curve Group premises in line with manufacturers or statutory guidance.
- Manage any ongoing construction works at any Learning Curve Group premises.
- Ensure that all requirements of The Regulatory Reform (Fire Safety) Order 2005 (FSO) (as amended) are maintained throughout all buildings used by Learning Curve Group where required.

Delivery Staff

All our delivery staff will:

- Ensure that they lead by example on all matters of HSRM and that all learners always follow company safety policies while under their control.
- Ensure that all learners under their control are aware of the risk assessments in place for each activity, ensuring safe systems of work and follow them at all times.
- Ensure that all learners wear any mandatory Personal Protective Equipment (PPE), as directed by the departmental risk assessments, in all teaching sessions delivered and that any learners with items missing are challenged and requested to comply with the procedures set out.
- Ensure that all learners have been provided with their entitled information regarding health and safety.
- Report any learner accidents, incidents, and near misses to their management team immediately and complete online reporting form using LCG H&S accident & reporting system.
- Carry out regular safety talks to learners based on the courses being taken and the relevant risk in the activity.

First Aiders/Appointed Person

All first aiders/Appointed will:

- Be responsible for providing prompt first aid treatment to any person on LCG premises as and when required.
- Calling emergency services if required and being the point of contact/liasion as required.
- Take responsibility for the completion of the accident/other incident/near miss report and any other paperwork associated with the incident.
- Carry out and log regular checks on first aid kits within their respective offices and order any replacement items found to be out of date or missing or used.
- Notify all accidents, incidents, and near misses to the LCG Health and Safety Team as soon as possible after the occurrence.
- Record accidents on LCG H&S accident reporting form and notify manager and H&S team as required.

Fire Wardens/Marshalls

All fire wardens will:

- Be responsible for the safe evacuation of colleagues from any premises to which they are listed as a fire warden/marshal.
- Notify the fire brigade of any emergency requiring their attendance and liaise with them on their arrival where required. In an emergency call 999.
- Report back to the Head of Risk with any faults or actions arising because of any fire evacuation or fire drill.
- Take responsibility for carrying out weekly fire alarm tests in their buildings and logging these in the site's health and safety files on LCG H&S Management system

Colleagues

All colleagues will:

- Comply with statutory legislation, the company Health and Safety Policy and all other work-related procedures always.
- Take reasonable care of themselves and anyone else who may be affected by their work.
- Use the correct tools and equipment for the job and ensure that they are kept in good condition.
- Understand the emergency procedures for the building they are working from.
- Work in accordance with information and training that has been provided to ensure their own safety and that of their colleagues.
- Make use of safety aids, appliances, equipment, and PPE where necessary provided adequate training has been provided on their use beforehand
- Refrain from intentionally misusing or recklessly interfering with anything that has been provided for health and safety reasons.
- Report any hazardous defects in their workplace, any plant/equipment, or shortcomings in any existing safety arrangements to their line manager, while making the area/equipment safe if possible.
- Not undertake any task for which authorisation and/or training has not been given.
- Attend any HSRM training as required for their role.
- Co-operate in keeping welfare facilities clean and tidy.
- Know where the first aid box and first aiders/appointed person(s) are within their respective offices/academies.
- Ensure that corridors, office floors and doorways and walkways are kept clear and free from obstruction.
- Staff to ensure Academy activity areas abide by SSW and if required PPE is worn by them and learners.
- Report any accident, incident or near miss, however minor, to their line manager or supervisor at the earliest opportunity and report on LCG H&S online reporting system through Developer

Arrangements

Learner Safety

The health and safety of all our learners is at the centre of everything that we do. Specific risk assessments are carried out for any activity that could cause harm to a learner with individual control measures put in place where required. As a responsible training provider, we will ensure, so far as is reasonably practicable, that all buildings, work areas, local environments and work equipment are all a safe standard to ensure the safety of all our learners is always maintained. Where additional support is required, based on specific risk assessment outcomes or educational care plans this will be referred to the LCG SENCO to assess the requirements and confirm we can suitably put individual measures in place to support the learner. This will be discussed with the quality and delivery team as required along with Head of Risk to ensure controls adequate in line with any Educational Health Care Plan (EHCP)/Special Educational Needs (SEN) requirements. This must consider safety of learner and others and if any risk to this then placement should not be given unless suitable controls can be initiated to support and reduce risks.

Fire Safety

Fire is a hazard that could affect any of our premises at any time. The consequences of fire include not only a threat to life, but also a health and safety risk to our colleagues and learners, damage to or loss of property and severe interruption to normal business activities and opportunities.

Our fire safety measures include preventing outbreaks of fire and mitigating the direct and consequential damage by early detection, reducing the risk of fire spread by structural containment, and providing emergency escape routes, emergency evacuation procedures and means for fire detection and firefighting. All colleagues should familiarise themselves with and comply with the fire safety measures in place for their workplace and report any defects or hazards to their line manager immediately. Colleagues who work in several premises should familiarise themselves with the fire safety measures for each premises on their first visit.

Fire Safety Procedure (2.1.1) has been developed which sets out the organisation and arrangements to ensure, as far as reasonably practicable, that in all our workplaces and during all work activities:

- Fires are prevented.
- People are protected against fire.
- Property is protected against fire.
- Essential business is not interrupted by fire.
- Suitable procedures are followed if fire occurs.
- All fire precautions are monitored and maintained.
- Collaboration with other premises owners/employers (including tenants in shared workplaces) takes place to ensure the safety of all colleagues.

In the fulfilment of this, all Learning Curve Group operated buildings will be risk assessed in accordance with the Regulatory Reform (Fire Safety) Order 2005. The assessment will determine the number of fire wardens and any fire prevention/control facilities necessary to provide adequate cover for all colleagues.

First Aid Arrangements

We will ensure that all arrangements for first aid, as required by the Health and Safety (First Aid) Regulations 1981, are met across the company. This includes providing identified colleagues with appointed person or first aiders respective training, providing first aid facilities and equipment suitable for the environment they are being used in and providing colleagues with information and instruction on how to obtain first aid assistance in their workplace. As a minimum, each workplace will have:

- A suitably stocked first aid box/kit.
- An appointed person to take charge of first aid arrangements.

A first aid 'arrangements' notice must be displayed at all workplaces in a prominent position. All our work activities, regardless of their location, will be assessed to determine the first aid arrangements and facilities needed for:

- Colleagues, learners, and temporary and casual staff.
- Visitors.
- Collaboration with other employers, e.g., contractors or tenants in shared workplaces.

The assessment will determine the number of appointed persons and trained colleagues and the first aid facilities necessary to provide adequate cover. Colleagues nominated to be a first aider will be selected and assessed as suitable prior to training and provided with the ongoing training needed to maintain competence. For more information, please refer to 2.1.7 First Aid Procedure.

Accident Reporting

Accidents and incidents at work cause thousands of serious injuries and hundreds of fatalities in the UK every year and can also cause damage to property, lost production hours and harm to a company's reputation. By reporting accidents, incidents and near misses, the causes can be ascertained, and preventative action can be taken to prevent a reoccurrence.

Accident and Incident Reporting Procedure (2.1.2) sets out the arrangements for ensuring all accidents, including near misses, that occur during the course of our activities are reported promptly and investigated to determine if any lessons learned that need to be implemented.

The procedure provides essential information to:

- Ensure action is taken to prevent recurrence.
- Meet statutory requirements, including the reporting of incidents under RIDDOR 2013.
- Help monitor and improve health and safety performance.
- Provide information for responding to claims made against Learning Curve Group.
- Enable us to respond quickly and accurately to external enquiries.

Control of Substances Hazardous to Health (COSHH)

As set out in the Control of Substances Hazardous to Health Regulations 2002, any substances used by colleagues which are deemed hazardous to health will require a suitable assessment to be carried out prior to the substance being used. Learning Curve Group will ensure that these assessments are available to all colleagues who may be affected by the product and will provide suitable training and instruction on its safe use where required. If the task can be redesigned so that the use of the product is made obsolete, then this should be carried out. As a last resort or if product manufacturer controls

state the use of PPE this will be provided for all colleagues using the product or who may be affected by its use.

Risk Assessment

The Management of Health and Safety at Work Regulations 1999 require us to assess all significant risks across the business and record the significant findings of any assessment. This also includes overall business risks, and we maintain as part of HSRM the risk registers with controls in place to reduce risks.

To ensure we meet this duty of care, risk assessments will be carried out for all relevant work activities to ensure that appropriate control measures are identified and put in place to ensure that safety implications and health protection are properly considered to prevent accidents and ill health. The arrangements required to address serious and imminent danger are also part of this process.

Relevant professional support should be consulted in good time for advice and support before any high risk or complex activity is undertaken. The essential requirement is that at any time, the manager responsible for the work activity will be able to demonstrate:

- That a suitable and sufficient risk assessment has been carried out, in good time and for every stage, for all their work activities.
- That the necessary controls identified have been put in place.
- That effective communication of significant findings to those who may be affected by the activity has taken place.
- That assessments are recorded and reviewed in the light of change.
- That the controls continue to be appropriate for the activity.

All those involved in the activity, including the manager responsible for the work location, will provide relevant information to assist the risk assessment process and will cooperate with those responsible to ensure appropriate controls are successfully implemented. For more information on how to complete risk assessments, please refer to Risk Assessment Procedure (2.1.8).

Display Screen Equipment (DSE)

The Health and Safety (Display Screen Equipment) Regulations 1992 define Display Screen Equipment (DSE) as any device or equipment that has an alphanumeric or graphic display screen, regardless of the display process involved; it includes both conventional display screens and those used in technologies such as laptops, touchscreens, and other similar devices.

Computer workstations or equipment can be associated with neck, shoulder, back or arm pain, as well as with fatigue and eye strain if incorrect ergonomics used by user. We will ensure that a DSE assessment is completed for every colleague who is classified as a 'user' under the Regulations and will follow up any actions arising from the individual assessments where required. For further information on display screen equipment, please refer to 2.1.3 Display Screen Equipment Procedure.

Manual Handling

Manual handling relates to the moving of items either by lifting, lowering, carrying, pushing, or pulling, this can also include repetitive tasks where body movement is taking place. The weight of the item is an important factor, but many other factors can create a risk of injury, for example , the number of times you have to pick up or carry an item, the distance you are carrying it, where you are picking it up from or putting it down (picking it up from the floor/putting it on a shelf above shoulder level) and any

twisting, bending, stretching or other awkward posture you may adopt while doing a task. As detailed in the Manual Handling Operations Regulations 1992, we will carry out an assessment of all manual handling tasks within the company and, wherever possible, reduce the risk to colleagues when carrying out these tasks. For more information, please refer to Office Safety Procedure (2.1.6).

Working at Height

Working at height means work in any place where, if there were no precautions in place, a person could fall a distance liable to cause personal injury. For example, you are working at height if you:

- Are working on a ladder or a flat roof.
- Could fall through a fragile surface.
- Could fall into an opening in a floor or a hole in the ground.

We are committed to reducing accidents to as low a level as possible to minimise the injury to our colleagues and others who may be affected by our work activities. Where working at height is taking place, a sensible approach should be taken when considering safety precautions. There is a common misconception that ladders, and stepladders are banned, but this is not the case. There are many situations where a ladder is the most suitable equipment for working at height, which will be detailed in the risk assessment carried out prior to the work commencing.

Before working at height, you must work through these simple steps:

- Avoid work at height where it is reasonably practicable to do so.
- Where work at height cannot be avoided, prevent falls using either an existing place of work that is already safe or the right type of equipment.
- Minimise the distance and consequences of a fall by using the right type of equipment where the risk cannot be eliminated.

Any colleague who is required to carry out working at height must ensure that they have sufficient skills, knowledge, and experience to perform the task, or, if they are being trained, that they work under the supervision of somebody competent to do the task. For more information on working at height, please refer to Working at Height Procedure (2.1.4).

Asbestos

Asbestos can be found in any building built before the year 2000 (houses, factories, offices, schools, hospitals, etc.) and causes around 5000 deaths every year. We acknowledge the duty to manage asbestos under the Control of Asbestos Regulations 2012 in any premises used for our undertakings where it may be present, and will:

- Find out whether the premises contain asbestos, and, if so, where it is and what condition it is in. If in doubt, materials must be presumed to contain asbestos.
- Assess the risk from asbestos present in the premises.
- Plan to manage that risk and act on it.
- Provide this information to other employers (e.g., building contractors) who are likely to disturb any asbestos present, so that they can put in place appropriate control while the work is being done.

Asbestos is only dangerous when disturbed. If it is safely managed and contained, it doesn't present a health hazard and shouldn't be removed unnecessarily – removing it can be more dangerous than leaving it in place and managing it. For more information on asbestos, please refer to the Head of Risk.

Threat of Terrorism

Terrorism is 'the unofficial or unauthorised use of violence and intimidation in the pursuit of political aims. It is the policy of Learning Curve Group to manage any potential for terrorism, including suspicious mail items, cyber threats, bomb threats and firearms, and provide arrangements to ensure the safety of all colleagues, learners, and visitors to the Company. For more information, please refer to the Protect/Prevent Risk Assessment and Action Plan. This under the new Protect duty legislation (known as Terrorism the Protection of Premises bill) or known as 'Martyn's Law' places further ownership of site or event managers if they fit into scope of the duty.

Where the site will have an occupancy of 200+ they will fit into scope 1 (Standard) for the duty and Scope 2 for (Enhanced) scope if capacity of 800+ including if an event such as large conferences, etc.

We will as part of the duty ensure that where sites meet the scope have further control measures to increase if required any security controls, and ensuring staff trained as required to understand actions to take if an incident was to take place.

We must be practicable however that the risk posed to LCG sites is very low in most cases, however we will ensure we are compliant as required. We may be linked to sites where the threat may increase be it within a city centre or as per our military academies on military establishments. When on shared sites including not just military but some of our H&B sites are collocated in large buildings, we will also have to abide by the premises controls and measures required under the protect duty.

HoR and the H&S team will be responsible for ensuring required measures completed and where required an ATRA (Anti-Terrorist Risk Assessment) is completed and actioned as required.

Criminal Activity

Unfortunately, criminal activity can take place at any time and across the country. We take measure to reduce and prevent possible criminal activity taking place in the means of site security, alarms, CCTV when required and staff trained on awareness, ensuring any visitors are signed in and always supervised as well as awareness on any possible tailgating into premises and challenging any unknown person in a courteous way to establish purpose of visit. All attractive items to be secured away when not in use. We place high emphasis on data security as per data protection requirements. All staff complete training on data protection. LCG IT systems protected and monitored for any potential breaches.

Personal Protective Equipment (PPE)

Personal Protective Equipment (PPE) is equipment that will protect the user against health or safety risks at work. It can include items such as safety helmets, gloves, eye protection, high-visibility clothing, safety footwear and safety harnesses, and Respiratory Protective Equipment (RPE).

Where PPE/control is required due to any national or local authority level for any public health requirement such as a pandemic, biological hazard we will always follow government guidelines in relation to items required for colleagues and learners and source any items from reputable suppliers based on specifications outlined by local or national government.

Making the workplace safe includes providing instructions, procedures, training, and supervision to encourage people to work safely and responsibly. Even where engineering controls and safe systems of work have been applied, some hazards might remain.

These include injuries to:

- The lungs, e.g., from breathing in contaminated air
- The head and feet, e.g., from falling materials.
- The eyes, e.g., from flying particles or splashes of corrosive liquids
- The skin, e.g., from contact with corrosive materials
- The body, e.g., from extremes of heat or cold

PPE is needed in these cases to reduce the risk. However, it should be used as a last resort and only after engineering controls have been implemented as part of a dynamic risk assessment process. For more information, please refer to the Head of Risk.

Consultation with Colleagues

Consulting with colleagues on health and safety matters can have real benefits for a business, including:

- Increased productivity – businesses with good workforce involvement in health and safety tend to have a better productivity rate.
- Improvements in overall efficiency and quality.
- Higher levels of workforce motivation.

In line with the Information and Consultation of Employees Regulations 2004 we will consult with colleagues at regular intervals over the calendar year to take account of their views before making some health and safety decisions, including risks arising from health and safety activities. As a guiding principle, we encourage consultation and discussion with colleagues on health and safety matters affecting their work. Those directly involved with the work can help identify the hazards and risks associated with it and may identify practical measures to help to control them. This also helps to ensure that any control measures introduced are practicable and supported, thereby assisting their implementation.

Lone Working

Lone workers are those who work by themselves without close or direct supervision. Working alone is not against the law, and it is often safe to do so. However, we will take steps to ensure risks are removed where possible or will put in place control measures required to protect our colleagues from the risks of lone working. For more information on lone working, please see Lone Worker Procedure (2.1.5).

Contractor Control

It is our policy to eliminate all work-related accidents and constantly achieve the highest levels of operational safety performance. To this end, we expect any contractors to apply the same high standards in conducting their work activities. All contractors must carry out their work strictly in accordance with the Health and Safety at Work Act 1974 and any other regulations which may apply, in addition to our internal policies and procedures where applicable.

Where work being carried out by contractor's border or overlaps into areas used by others – including our colleagues, the general public or clients – then all reasonably practicable care must be taken by subcontractors to safeguard all persons and property from risks arising from their work operations and activities. For more information on contractor control please refer to the Head of Risk or the Office safety Procedure (2.1.6).

Selection, Maintenance, Inspection and Testing of Plant and Work Equipment

Work equipment is any machinery, appliance, apparatus, tool, or installation for use at work, whether exclusively used at work or not. The scope of work equipment is therefore extremely wide and any colleague who is tasked with operating any type of work equipment must have undertaken sufficient training to ensure that they know how to competently use it, without unnecessary risks to the health and safety of themselves or others. Formal arrangements will be in place for the selection, maintenance, inspection and testing of plant and equipment which we own and/or use, to ensure that it is safe, fit for purpose and legally compliant.

To ensure that any equipment provided is safe for use, we will ensure that the following arrangements in relation to work equipment will be taken into consideration:

- Procurement will include the hiring of safe equipment and plant from reputable suppliers.
- Equipment is only used for its intended purpose.
- Competence requirements for operators are met, including instruction, information, and training.
- User checks are carried out prior to use.
- The frequency for inspection and maintenance is in line with manufacturers'/suppliers'/installers' recommendations, company risk assessments and statutory requirements.
- Communication of the findings of formal inspections is to all affected parties.
- Fault and defect reporting and corrective action are carried out.
- Preventative maintenance programmes are in place.
- Appropriate permits to work arrangements are in place where required.

Maintenance work must only be undertaken by persons who are competent to carry it out and who have the necessary knowledge and experience to:

- Know what to look at.
- Know what to look for, know what to do.
- Be aware of, and able to avoid, unnecessary risks to themselves and others.

Any colleague that finds a defective item of work equipment must take it out of operation immediately, quarantine it and inform their line manager immediately. The equipment must not be used under any circumstances until it has been examined by a competent engineer.

Electrical Equipment and Testing

Electricity is a familiar and necessary part of everyday life, but electricity can kill or severely injure people and cause damage to property. There are simple precautions when working with or near electricity that can be taken to significantly reduce the risk of electrical injury to you and others around you. The Electricity at Work Regulations 1989 require electrical equipment to be maintained to prevent danger. Any work carried out on electrical systems throughout our premises will be carried out by competent persons without exception.

In relation to portable electrical equipment, the type and frequency of user checks, inspections and testing needed will depend on the equipment, the environment in which it is used and the results of previous checks. Through a series of user checks, visual inspections, and portable appliance testing if required, we will endeavour to ensure that all electrical equipment used in our premises will be safe for use by all colleagues. For more information on electrical equipment safety please refer to the Head of Risk

Workplace/Delivery Venue Vetting

We are required to ensure health and safety legal requirements that exist to protect persons at work and others affected by work are suitable. We have responsibility for ensuring that colleagues and learners are vetted in line with procedures laid down by the Education and Skills Funding Agency (ESFA) and Health and Safety Standards (HASS). We must judge the suitability of health and safety in the place where training and learning are conducted. For more information, please refer to Workplace and Delivery Venue Vetting Policy (2.1.9).

Health and Safety Training

All new staff undertake Health and safety training and awareness as part of their induction and individual training plans completing respective online H&S awareness courses. Health and safety training is an integral part of company development to ensure colleagues development and will be identified alongside Human Resource policies and procedures. A training matrix will be developed for all job roles, detailing what health and safety training is required based on competence levels for individual roles.

Training requests can be initiated by a response to managerial requests, new work activities or new work equipment being introduced, in response to annual appraisals and based on recommendations from the Director of Risk or because of health and safety audits.

Office Safety

We are committed to meeting our legal obligations to provide all colleagues, learners, and visitors with a safe and healthy place of work and will ensure that all premises in our property portfolio, which we own or lease (and, where applicable, sub-leases), including temporary premises, are selected, maintained, and monitored as to their suitability and legal compliance (including all necessary statutory permissions and/or exemptions).

There will be arrangements in place to ensure compliance with our own health and safety guidelines and legal requirements, and to ensure that records of relevant safety information are established and maintained for each building. There will be close liaison with the landlord of premises where our colleagues are working, and landlord/tenant agreements will cover accountabilities, responsibilities, working environment issues and facilities management. For more information, please refer to Office Safety Procedure (2.1.6).

Legionella Control

We will control, prevent, and minimise the risk from Legionella, to provide and maintain safe and healthy working conditions, equipment, and systems of work for all colleagues, learners, contractors, and visitors, and provide such resources, information, training, and supervision as needed for this purpose. We will do all that is reasonably practicable to manage the risk of Legionellosis and will follow the steps laid out in the Control of Legionella Procedure and site- specific written control schemes as based on the Health and Safety Executive (HSE) Approved Code of Practice and Guidance Document L8 (ACOP L8) The Control of Legionella Bacteria in Water Systems. For more information, please refer to Office Safety Procedure (2.1.6) or the Head of Risk.

Driving on Company Business

We are committed to ensuring all colleagues who drive a motor vehicle on our behalf of LCG business do so in a safe, efficient, and effective manner.

Any colleagues who use a vehicle for driving on behalf of the company, whether it be a work supplied vehicle, or a personal vehicle must ensure:

- The vehicle is roadworthy and is safe to drive before every business trip.
- You follow the highway code and any local rules in the areas they are driving.
- Any vehicle faults are highlighted and repaired as soon as possible (including those on company vehicles).
- You have business insurance cover for any vehicle used on company business.
- You hold the correct driving licence for the vehicle you are driving.
- You follow the law on operating or using a sat nav or mobile phone in the vehicle while you are in control of it. We do not expect you to make or answer the phone when driving unless you are in a safe place, or it is an emergency. We will accept no liability for fines or penalty points if you use a mobile phone or other devices while driving for company business.
- You inform us of any medical or physical impairment that may prevent you from driving. This also includes notifying us if you receive any penalty points or driving bans in the course of your employment.
- You inform the Head of Risk of any accidents you are involved in while driving on company business.
- LCG will not be liable for any speeding or parking fines and drivers should ensure they abide by the respective speed limits and any parking rules in place.

For any vehicle that is owned by the company, we will ensure that:

- They are maintained as per manufacturers guidelines ensuring all statutory inspections and road taxes are carried out on time.

Health, Safety and Risk Performance Monitoring

Objectives

This includes determining the risk attitude of the group – understanding the present and foreseeable context to determine how open to risk LCG should be.

The 'risk appetite' in relation to specific strategic risks - the evaluation of the strategic risks via the Business Continuity committee audit, Risk and Assurance also provides a regular review of the LCG's risk tolerance, including what types of risk are acceptable, and which are not.

Group health and safety objectives and a corporate programme plan/action plan will be set and will be monitored by our health and safety consultation group. This will provide a systematic appraisal of performance with a view to enhancing standards.

Monitoring

Our overall performance against the group health and safety programme plan/action plan and any key performance indicators will be collated and reported periodically to the Executive Board by the Head of Risk. They will also be responsible for ensuring there are adequate arrangements for monitoring the health and safety standards, arrangements, and compliance within their department, which will include:

- Monitoring risk assessment processes
- Routine inspections

- Periodic reporting on significant initiatives, issues, or incidents as part of the normal managerial reporting process
- Analysis of accident/incident data and suspected work-related ill health

Audit and Review of Performance

Audit

Audits will be carried out by the Head of Risk, or the H&S Coordinators, they may also include other independent groups, as part of the arrangements for monitoring our health and safety performance and management system. The scope and focus of health and safety audits will be subject to consideration by the Director of Performance and Development. Business departments will be required to afford proper cooperation in the audit process where required.

Management Review

Our Executive Board will receive an Annual Health and Safety Review report of Company performance and progress compiled by the Head of Risk.

RELATED POLICIES AND PROCEDURES

Group 1 – Human Resources

- 1.1 Disciplinary Policy
- 1.2 Absence Policy
- 1.4 Anti-Bullying Policy
- 1.5 Whistleblowing Policy
- 1.7 Professional Development and Performance Management Policy
- 1.8 Recruitment Policy
 - 1.8.1 Recruitment Procedure
 - 1.8.2 Associate Procedure
- 1.16 Code of Ethics and Conduct

Group 2 – Health and Safety and Safeguarding

- 2.1.1 Fire Safety Procedure
- 2.1.2 Accident and Incident Reporting Procedure
- 2.1.3 Display Screen Equipment Procedure
- 2.1.4 Working at Height Procedure
- 2.1.5 Lone Working Procedure
- 2.1.6 Office Safety Procedure
- 2.1.7 First Aid Procedure
- 2.1.8 Risk Assessment Procedure
- 2.1.9 Workplace and Delivery Venue Procedure
- 2.3 Drugs and Alcohol Policy
- 2.4 Business Continuity Policy
 - 2.4.2 Bomb Threat Procedure
 - 2.4.3 Incident Response Policy
- 2.5 Physical Security Information Policy

Group 4 - Quality and Support

- 4.1 Continuous Improvement and Quality Handbook
- 4.10 External and Internal Assessment Policy
- 4.12 Learner Attendance Policy
- 4.2 IQA and Moderation Policy and Procedure
- 4.4 Teaching, Learning and Assessment Handbook
- 4.5 Observation Handbook
- 4.7 Management of External Quality Assurance and End Point Assessment Policy

Group 5 – Data Protection, Security, and Information

- 5.1 Data Protection Policy
 - 5.1.1 Data Breach Procedure
 - 5.2 IT Acceptable Use Policy
 - 5.2.1 Password Policy
 - 5.2.2 Clear Desk Policy
 - 5.2.3 Cryptography Policy
 - 5.2.4 BYOD Policy
 - 5.2.5 Social Media Policy
 - 5.2.6 Online Engagement Guidelines
 - 5.3 E-Safety Policy
 - 5.5 Resources Access Policy
 - 5.5.1 Physical Access Policy
 - 5.6 Information Security Policy
 - 5.6.1 AI Usage Policy
 - 5.6.2 Secure Development Policy
 - 5.7 Supplier Security Policy
 - 5.8 Data Classification Policy
 - 5.9.1 Records Retention Schedule
- Acceptable Use Agreement -Learners
Data Breach Report Form
Data Subject Access Request Form

Group 6 – Finance Policies

- 6.1 Financial Policy
 - 6.1.4 Approval of Contracts and Agreements Procedure
- 6.2 Anti Bribery Policy
- 6.3 Fraud Prevention Policy
- 6.4 Procurement Policy and Procedure
 - 6.4.1 Procurement Strategy

Group 7 – MIS and Compliance

- 7.1 Audit Strategy
- 7.2 Initial Assessment and Prior Learning Policy
- 7.4 Contract Exit Plan