



Health and Safety Policy

Version 9.0



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Version Control

VERSION	REVIEWER NAME	DATE	NEXT REVIEW	COMMENTS
1.0	Rena Panesar	Jan 2017	Jan 2018	First Policy.
2.0	Rena Panesar	Jan 2018	Jan 2019	Updated.
3.0	Rena Panesar	Jan 2019	Jan 2020	Updated.
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9.0	Policy Pros	Oct 2025	Oct 2026	Retemplated and updated.



Introduction and Purpose

Pathways LDN is committed to providing a safe and healthy environment for our staff, learners, apprentices, visitors and partners. We plan and deliver training, advice and guidance, online learning, and work-based placements so that risks are identified, controlled and reviewed.

Our arrangements meet our duties under UK health and safety law, including the Health and Safety at Work etc. Act 1974 and the Management of Health and Safety at Work Regulations 1999, and also reflect current education guidance for learners.

This policy sets out how we organise health and safety across in-person training and assessment, online activities and employer premises. It explains responsibilities, consultation with staff and learners, risk assessment, incident reporting and first aid, fire safety, infection prevention, and the checks we make before any placement.

Who and what this policy applies to

This Health and Safety Policy applies to all Pathways LDN activities, people and places involved in delivering training, advice and guidance, online learning, apprenticeships and work-based placements across the UK.

It covers employees, workers, agency staff, contractors, learners and apprentices, visitors and employer partners while engaged in Pathways-organised activity.

The policy applies in classrooms and offices, on employer and third-party premises, during off-site events, in vehicles used for business purposes, and in all digital environments used for delivery or support.



Roles and Responsibilities

At Pathways LDN, health and safety are everyone's responsibility. However, the main responsibilities are listed below.

Directors

The Directors will:

- Take overall responsibility for the management of health and safety.
- Take reasonable steps to familiarise themselves with the hazards and risks associated with the business functions.
- Ensure that Pathways LDN is compliant in regard to all statutory legislation and guidance that apply to the running of a business such as ours.
- Ensure that the necessary policies, risk assessments, and addenda related to the management of health and safety are produced by a competent person to a high standard and reviewed annually or as necessary.
- Work with staff, learners, employers, and all stakeholders in consultation with the aim of eliminating risk or minimising risk to an acceptable level.
- Ensure that all persons working for or on behalf of the organisation are suitably trained and adequately supervised.
- Ensure that all staff fulfil the health and safety responsibilities allocated to them.
- Ensure that adequate provision is made for welfare facilities and first aid.
- Ensure that incidents, accidents, and near misses are reported, recorded, investigated and reported to the authorities promptly, with actions arising and lessons learnt implemented and communicated to staff and other stakeholders where appropriate.
- Report, as required, any specific workplace incidents, including serious injuries, occupational diseases (e.g., infections contracted at work), and dangerous occurrences under RIDDOR.
- Reprimand staff for failing to discharge their health and safety responsibilities.



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Staff

All staff will have responsibility for:

- Familiarising themselves with the Health and Safety Policy.
- Acting responsibly and taking reasonable care in their work practices.
- Adhering to prescribed health and safety procedures and protocols.
- Cooperating with the Directors in respect of Health and Safety management.
- Communicating Health and Safety concerns to the Directors.
- Cooperating with accident and incident investigations.

Partners (Partner Trainers and Employers)

Our partners will:

- Provide a safe and healthy environment that meets UK legal duties, including risk assessments, safe systems of work, and maintained equipment.
- Deliver a suitable induction programme covering local risks, supervision, emergency procedures, first aid, fire safety, welfare facilities, and reporting lines.
- Ensure adequate, competent supervision at all times, with named contacts for day-to-day oversight and emergencies.
- Supply, maintain, and enforce suitable PPE and any required training or certification before higher-risk tasks begin.
- Hold appropriate insurance and share confirmation on request.
- Make reasonable adjustments for disability or health needs and inform Pathways LDN of any material risk changes.
- Record and report accidents, incidents, and near misses the same day to Pathways LDN, and notify enforcing authorities under RIDDOR where required.
- Cooperate with monitoring visits, audits, and reviews.



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Learners

Learners are expected to:

- Follow safety instructions, site rules, and online conduct rules, and ask if anything is unclear.
- Take part in and engage with safety briefings and induction programmes.
- Tell us about any health condition, medication, disability, or learning need that may affect safety, and agree on reasonable adjustments.
- Use equipment, tools, and PPE correctly, and never bypass guards or controls.
- Report hazards, near misses, injuries, illness, or safeguarding concerns immediately.

Remember – Health and Safety is
EVERYONE's responsibility!



Health and Safety Arrangements

Workplaces

(The Workplace (Health, Safety and Welfare) Regulations 1992)

Staff may either work from our main office/centre, their homes, third-party sites (rented venues, employer sites, etc.) or a combination of the above.

The Main Office/Centre

Pathways LDN will ensure that our primary workplace meets the health, safety and welfare needs of all those who will use it and is fit for purpose.

Any issues with the site will be referred to the Directors, who will take the necessary action.

Pathways LDN* will ensure that:

- The external and internal structures of the buildings are in a good state of repair.
- Access and egress routes are safe.
- There are adequate welfare facilities at the main office/centre.
- The premises are risk-assessed regularly (including fire and other relevant risk assessments).
- The premises are surveyed for asbestos, and where asbestos cannot be removed from our premises, it is enclosed to prevent further damage and exposure.
- The gas and electrical installations are serviced in line with statutory requirements.
- Waste is stored in a safe place and is regularly collected.
- Temperatures in the workplace are appropriate.
- There is sufficient space, ventilation, and lighting.
- Fixtures and fittings are well maintained.



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*Please note that whilst some of these responsibilities lie with the landlord's building management provider, Pathways LDN will cooperate and liaise with responsible persons with regard to any necessary inspections/testing and/or remedial work.

Third-Party Venues

The premises of other organisations are spaces over which Pathways LDN has little to no control. However, staff should be aware of their surroundings and are not expected to endanger themselves whilst at work.

Staff must immediately remove themselves from and report any unsafe third-party sites to the Directors, who will advise as to how to proceed. Where deemed unsafe, the work planned at that location will not go ahead until the concerns/hazards have been addressed.

Working From Home

Staff homes are spaces that Pathways LDN has little to no control over. However, in the interests of protecting the health and safety of our staff, we recommend that their working environment be maintained, clean, and safe.

- Staff should ensure that their work equipment is suitable and well-maintained.
- Workstations should be set up to reduce the risk of occupational disease (see Display Screen Equipment section below).
- Due to the nature of our work, the first aid needs for this type of work are assessed as being low risk, and therefore, a domestic first aid kit is satisfactory.
- Staff with a disability should inform Pathways LDN if they require a reasonable adjustment to allow them to work safely from home (see Display Screen Equipment section below).
- As lone workers, Pathways LDN will keep in regular contact with staff working from home. These contacts will include, but are not limited to, assessing and managing the risks of the role, stress, and occupational health, assessing whether health and safety management is considered adequate in the staff member's view, and providing ongoing support and training.



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Health and Safety Law Poster

A Health and Safety Law poster will be displayed at the main Pathways LDN office/centre. The equivalent leaflet will be provided to staff who do not frequent the office/centre.

Insurance

Pathways LDN will hold the appropriate level of employer's liability insurance and public liability insurance.

Health and Safety Risks and Risk Assessment

Risk Assessment

Risk assessments are extremely important as they form an integral part of an occupational health and safety management plan, as they help to:

- Create awareness of hazards and risks.
- Identify who may be at risk and how they may be harmed.
- Prioritise hazards and control measures.
- Determine whether existing control measures are adequate or if more should be done.

Pathways LDN Risk Assessments will:

- Be undertaken for all potential hazards (e.g., trips and falls, violence, lone working, etc.).
- Consider all people working for or on behalf of the organisation and others who might reasonably be affected by our work.
- Be completed by competent persons and reviewed regularly.

The Directors will ensure that all necessary risk assessments take place and that all resulting control measures are implemented.

Staff, learners and other stakeholders affected will be consulted in the production of risk assessments, with all findings being made available to them for review.

Should further specialist advice be required, this may be obtained by the Directors from expert individuals or bodies outside of the organisation.



Fire Safety and Emergency Procedures

(The Regulatory Reform (Fire Safety) Order 2005)

Staff Responsibilities

- Staff, learners and anyone else using the office/centre must follow good housekeeping practices, keeping work and activity areas clear of unnecessary materials.
 - Combustible materials must not be stored adjacent to heat sources nor be allowed to accumulate.
 - All waste bins will be emptied daily or when they become $\frac{3}{4}$ full.
 - Gangways, stairwells, corridors and emergency exits must never be obstructed.
- Electrical equipment must be switched off when not in use and checked regularly for defects.
- Smoking, vaping, or the use of candles is strictly prohibited in our office/centre.
- All staff working at our office/centre will familiarise themselves with emergency evacuation arrangements. Fire Wardens will manage evacuation procedures.
- Where third-party venues are used, staff will cooperate with venue management to ensure compliance with their fire prevention rules and emergency evacuation procedures. Staff should also:
 - Brief learners and other visitors on essential fire safety information at the start of sessions (e.g., fire exits, assembly points, what to do if the alarm sounds).
 - Support the venue's staff in ensuring that evacuation procedures are followed promptly and safely if an alarm is raised.
- Where Pathways LDN is aware in advance that a staff member, learner or visitor may require assistance, a PEEP will be put in place.
- Trained Fire Wardens may use fire extinguishers only if the fire is small, manageable, and they feel confident to do so.



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- Fire doors must be kept closed.
- Emergency exits must never be locked.

Landlord Responsibilities

The Responsible Person (landlord) must (for our office/centre):

- Carry out fire drills at least twice annually.
- Carry out a fire safety risk assessment annually or as required.
- Appoint adequate numbers of Fire Marshals and ensure that they are appropriately trained (including in the use of fire extinguishers).
- Ensure that:
 - Fire alarm call points will be tested weekly, and confirmation will be recorded in a Fire Safety logbook.
 - Adequate firefighting equipment is available and, in line with statutory requirements, is inspected monthly and serviced annually.
 - Emergency lighting is tested monthly and serviced as required.
 - Fire alarms are serviced in line with statutory requirements and as required.
 - Fire Door and Exit notices are displayed in line with regulations.
 - Any faults with the above are rectified without delay.

First Aid

Our Directors are both qualified first aiders. They are also the appointed persons, and will:

- Ensure first aid equipment and facilities are available and in good working order.
- Call for emergency services when needed.
- Keep records of emergencies and any first aid given.
- Take care of injured or ill persons.



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- First aid boxes will be readily available to all staff. The whereabouts of first aid boxes within the premises will be included in staff induction procedures.
- When working at third-party sites, staff must familiarise themselves with the local first aid provision (if provided) or carry portable first aid kits.

Electrical Safety

- Only authorised, electrically competent persons may carry out any repairs to any portable appliance, item of electrical equipment or electrical installation.
- All company-owned portable devices will be regularly PAT tested by a competent individual. This will be carried out annually.
- All staff should routinely examine any Company electrical equipment used and any electrical installations in the office/centre to look for defects and advise the Directors where they suspect that these may be in an unsafe condition.
- Staff should switch off electrical equipment when not in use and at the end of the day, except where continuous processes are involved.

Display Screen Equipment at Workstations

(Health and Safety (Display Screen Equipment) Regulations 1992) (as amended in 2002)

Working at a workstation in front of a screen puts staff at risk of eye strain, musculoskeletal problems and fatigue.

- Staff who must use DSEs for over one hour each day will be required to carry out workstation self-assessments to identify potential difficulties at their workstation. Where necessary, a full assessment will be undertaken.
- Staff with disabilities will be provided with specialist equipment where identified in a workstation assessment.
- The HSE recommend the following, which staff and those setting up workstations should be aware of:
 - Forearms should be approximately horizontal, and the user's eyes should be the same height as the top of the screen.



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- There should be enough workspace to accommodate all documents or other equipment.
 - Arrange the desk and screen to avoid glare or bright reflections. This is often easiest if the screen is not directly facing windows or bright lights.
 - Make sure there is space under the desk for the user to move their legs.
 - Avoid excess pressure from the edge of seats on the backs of legs and knees. A footrest may be helpful, particularly for smaller users.
 - It may be necessary to provide short breaks (every 60 minutes) to relieve eye strain or repetitive strain injury if it is essential that staff spend some of their working days using a display screen.
- DSE users are expected to follow health and safety practices when using their equipment in their homes.
 - Employees using a DSE for the majority of their working day are entitled to an eye test paid for by the business and may be entitled to the cost of glasses should they be needed specifically for DSE use.

Manual Handling

(Manual Handling – Manual Handling Operations Regulations 1992, as amended by the Health and Safety (Miscellaneous Amendments) Regulations 2002.)

Manual handling causes over a third of all workplace injuries, including musculoskeletal disorders such as pain and injuries to arms, legs and joints, and repetitive strain injuries of various sorts. Injuries can result from a single lift, but more commonly, long-term injury develops as a result of repeated minor injuries due to repetitive lifting.

Although staff will not be required to undertake any hazardous manual handling operations, it is important to note that manual handling means transporting or supporting any load by hand or bodily force. It includes lifting, putting down, pushing, pulling, carrying, or moving loads. For example, carrying a box of files from one room to another is classed as manual handling.

Pathways LDN will:



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- Make a suitable and sufficient assessment of the risk of injury from any hazardous manual handling operations that cannot be avoided. This assessment will consider the task, the load, the working environment and individual capability.
- Reduce the risk of injury from those operations as far as is reasonably practicable. For example, using specialist equipment such as trolleys.
- Train staff in safe moving and handling techniques.

Staff members must:

- Take reasonable care when lifting, moving, and handling.
- Follow the guidance, instructions, and procedures provided to them.
- Consult with the Directors if they consider a manual handling task hazardous and if those hazards are inadequately controlled.
- Refer to the HSE advice when lifting, moving and handling (Appendix A).

COSHH

(Control of Substances Hazardous to Health Regulations 2002)

Pathways LDN acknowledges our duty under the law to control substances that are hazardous to health in the workplace.

The use of hazardous substances is limited to standard cleaning substances and general household maintenance chemicals.

Pathways LDN will:

- Understand which substances are hazardous to health.
- Ensure that they are stored safely and securely.
- Train staff in the safe use of those substances.
- Provide the necessary PPE.
- Follow manufacturer guidance and best practice to protect others during their use.



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Slips and Trips

All staff are responsible for identifying slip and trip hazards and taking steps to eliminate or reduce the risk. This may be as simple as wiping up spilt liquid or ensuring that cables and boxes are not placed across walkways.

Slip and trip hazards within the main office that cannot be easily eliminated or reduced must be immediately reported to the Directors. The area should then be cordoned off until maintenance can take place.

Where a slip or trip has occurred, it must be recorded and reported in the Accident Book, no matter whether any injury is obvious.

Staff members working in areas where manual work is undertaken and/or there is a moderate risk of a slip or trip due to the task being carried out/the environment should wear suitable footwear.

Personal Protective Equipment (PPE)

Personal Protective Equipment at Work Regulations 1992 (as amended)

Whilst PPE is not a general requirement, where a risk assessment indicates the need for PPE, it must always be used, regardless of individual views on risk.

If PPE is required, the Directors will provide this to employees. However, self-employed staff will be required to provide their own.

Work Equipment

Pathways LDN will comply with **The Provision and Use of Work Equipment Regulations 1998**.

All staff shall receive training in the use of any equipment before using that equipment and must, at all times, use the equipment correctly.

All work equipment shall be maintained in efficient working order and in good repair.

Drugs and Alcohol

Pathways LDN has a zero-tolerance policy on the use of or possession of controlled substances.



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Being under the influence can affect health, work performance and safety and therefore, staff members should never be under the influence of mind-altering substances during working hours nor possess illegal drugs or alcohol at work.

Any staff member suspected of being under the influence will be questioned and removed from their area of work and may be subject to disciplinary action or termination of any working agreement/contract.

Staff taking any form of medication (prescribed or over-the-counter) are responsible for the following:

- Asking their GP or pharmacist about the effects any medication may have on their ability to work and undertake their specific duties safely; and
- Informing the Directors if there is a risk of adverse effects that may compromise their safety and/or the safety of others.

Likewise, learners must attend free from the effects of drugs or alcohol, and must not possess, use, or bring drugs, alcohol, or related paraphernalia to any Pathways LDN session, venue, or work placement; breaches may lead to removal from activities, disciplinary action, and reporting to the police where required.

Workplace Violence and Aggression

At Pathways LDN, we are dedicated to providing a safe and respectful working and learning environment free from violence, aggression, and any form of abuse, and we have a zero-tolerance policy towards it, whether it is directed towards staff, learners, partners or visitors. This includes physical assaults, verbal threats, bullying, and any behaviour that causes or could cause harm or distress.

In accordance with the **Health and Safety at Work Act 1974**, we take proactive measures to assess and manage the risks of violence and aggression in the workplace by:

- Identifying risks and taking proactive measures to reduce those risks.
- Having an open-door policy whereby staff, learners and visitors may approach any Director, should they have any concerns that there is a risk of violence or aggression.
- Supporting staff, learners and other stakeholders who experience violence/aggression.



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All incidents of violence or aggression must be reported to the Directors immediately (as per the procedure outlined below), who will notify the Police as required.

Pathways LDN reserves the right to halt service provision to any learner where our staff or any stakeholder have been subjected to violence, aggression, threats, or abusive behaviour (wherever the incident occurred). Services will only resume once appropriate measures have been put in place to ensure a safe working and learning environment for all.

Managing Workplace Stress

At Pathways LDN, we recognise that stress can impact the well-being, performance, and mental health of our staff and are committed to promoting a supportive working environment where stress is identified early and managed effectively.

The Directors will take the following steps to manage workplace stress:

- Regular Check-Ins and Support – Encourage open conversations about workload, emotional well-being, and challenges through regular supervision and check-ins.
- Encouraging Work-Life Balance – Promote healthy boundaries by discouraging excessive hours and ensuring adequate breaks and days off.
- Stress Risk Assessments – Conduct stress risk assessments when concerns arise, taking proactive steps to reduce workplace stressors.

New and Expectant Mothers

Pathways LDN recognises its obligations to take particular account of hazards to new and expectant mothers (a worker who is pregnant, who has given birth within the previous six months, or who is breastfeeding) when assessing the risks involved at work.

So that we can protect the health and safety of both the mother and the unborn child, staff should inform the Directors as soon as they know that they are pregnant.

Risk assessments for both new and expectant mothers will be kept under review due to variations in risks at various stages of pregnancy and because of different hazards which must be considered for workers who are breastfeeding.

If a risk assessment reveals that there is a substance or work process which could affect the health or safety of new or expectant mothers or their babies, we will inform them of the potential risks and any relevant control measures put in place to eliminate or sufficiently



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reduce this risk. If it is not possible to eliminate or adequately control the risk, we may take the following action to minimise any risk to the mother and baby:

- Temporarily adjust the working activities, conditions, or hours; and/or
- Offer suitable alternative work which does not present a hazard; and/or
- Suspend them from work for as long as necessary to protect them and their baby.

We also recognise our obligation to provide suitable facilities for workers who are pregnant or breastfeeding to rest.

Lone Workers

A "Lone Worker" refers to a worker carrying out their role in isolation from other workers without close or direct supervision.

Lone work always poses a hazard as lone workers face an increased risk of violence and accidents going unnoticed.

Due to the nature of our work, some staff are required to work alone from our office/centre, at their home or in the community (visiting our learners at their workplaces or attending third-party premises).

Our policy is to assess and take reasonable steps to minimise risk. Therefore, a comprehensive risk assessment will be carried out and reviewed regularly as a matter of course or when there are any changes in circumstances.

Risk assessments will be tailored to the individual circumstances and will consider the following:

- Suitability of the staff member to become a lone worker – staff who are medically unsuitable, uneasy about lone working, or who are not deemed competent will not be suitable.
- Suitability of lone working in relation to the work being undertaken – where the work being undertaken is itself hazardous (e.g., where a learner has a history of violence), then lone working will be deemed unsuitable.
- External hazards such as weather, a drop in mobile service, etc.

Control measures will normally include:



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- Practical guidance on lone working is provided to the staff member.
- Ensuring that communication is maintained through regular check-ins.
- Ensuring that defined working limits are in place so that staff are aware of their limitations and are confident in prioritising their safety.
- Implementing a process for escalating concerns.

Supervision and Training

Pathways LDN will ensure that its staff are trained and competent to undertake their duties. All staff will have access to this policy and the relevant procedures, guides, and risk assessments related to their work.

All staff will receive core health and safety induction training. Additional training will, for the most part, differ depending on the role but will usually include a tour of the office and building to point out the fire exits, assembly point, etc., and basic health and safety and first aid awareness. Staff will also have the opportunity to ask any questions.

Pathways LDN will also ensure that new staff receive the relevant supervision and support during their induction and/or when undertaking new roles or new tasks.

Safe Working Hours

Pathways LDN plans and manages staff rotas so working time is safe and lawful under the Working Time Regulations 1998.

- Staff should not work more than an average of 48 hours per week over a 17-week reference period unless they have signed an individual opt-out.
- Staff are entitled to at least 11 hours' daily rest, an uninterrupted 20-minute break when working more than 6 hours, and 24 hours' weekly rest or 48 hours in a fortnight.
- Night work limits, young worker protections, and pregnancy or health-related adjustments will be applied where relevant.
- Overtime must be agreed in advance.
- On-call, travel, and off-site events will be risk-assessed to prevent fatigue.



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The Directors will keep reliable records of hours and breaks, monitor workloads, and act where there is a risk of tiredness or stress. Staff must report concerns early so duties or timings can be adjusted.

Learners on apprenticeships or work placements must also receive adequate rest and breaks. Host employers are required to comply with the Working Time Regulations, including young worker limits, and Pathways LDN will review schedules and intervene where planned hours could breach the rules or create a safety risk.

Driving for Work

Certain staff members are required to drive as part of their role using their own vehicles. For example, they may drive to client homes to provide services.

Drivers must:

- Provide to the Directors:
 - A valid UK driving licence*.
 - Proof of valid insurance (covering business use and NOT simply commuting).
 - Details of the registration number and make, model, and colour of their car to check that the vehicle has road tax and an MOT certificate.
- Ensure that their vehicle is in a safe and roadworthy condition.

*Please note that staff may also be asked to provide a link so that Pathways LDN can review their driving licence details and check for penalties, disqualification, etc.

When driving for work, staff must also:

- Be fit and well enough to drive.
- Comply with road traffic laws.



Reporting and Managing Incidents and Accidents

Incidents are any event or circumstance which could foreseeably have resulted in unnecessary damage, loss, or harm and include:

- Near misses – any events that do not cause harm but have the potential to cause injury or ill health, e.g., a falling roof tile that did not cause injury but could have easily hit someone on the ground nearby; and
- Undesired circumstances – a set of conditions or circumstances that have the potential to cause injury or ill health, e.g., a staff member driving for work when they are medically unsuitable to drive.

Dangerous occurrences are several specific, reportable adverse events, as defined in the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR).

Accidents are any events that result in injury or ill health (including death).

It is the responsibility of staff to ensure that all accidents (including cases of work-related ill-health), incidents (including near misses), and dangerous occurrences, however trivial they may appear, are:

- Reported to the Directors; and
- Recorded in the Accident/Incident Book.

These actions must be completed as soon as possible and within 24 hours.

It is the responsibility of the Directors to investigate the circumstances of each accident and/or incident and to take appropriate action to try to prevent or minimise recurrence.

The investigations should identify the following:

- A factual chronology of the event.
- The root cause of the incident or accident, whether it was due to human error, procedural failure, equipment failure, negligence, malicious actions, etc.



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- An assessment of whether any actions taken were in line with internal policy and procedure, and/or best practice, and/or the authorities' requirements.
- Whether Pathways LDN could have reasonably foreseen and/or prevented the incident or accident.

Any conclusions will normally be ascertained by (where possible) reviewing the scene, taking witness statements, debriefing staff members and others affected, etc.

The response to an incident must be proportionate to the severity of impact or harm.

All incident and accident action plans and any subsequent risk assessments will be communicated to staff via the most appropriate communication methods available.

Reportable accidents, diseases and dangerous occurrences, as defined in the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR), will be reported to the enforcing authority by the Directors within the statutory reporting period.

A quarterly review of all incidents and accidents in that period will be undertaken to assist in identifying problem areas where our health and safety policy or procedure requires amendment.

All information collected, including information collected during investigations, must be stored securely for up to seven years and must, along with any further investigative material and risk assessments, be made available for inspection by the Health and Safety Executive and Local Authority.

Director contact details:

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Policy – Keeping Learners Safe

- Pathways LDN provides learning and work-based activities in-person, online, and at employer premises. We plan, deliver, and review these activities so that risks are identified and controlled, and so that learners of all ages can take part safely. Risk assessments are completed for all teaching environments, and the control measures implemented are practical and proportionate.
- Reasonable adjustments are agreed for disability, health or caring needs so that every learner can participate safely and on equal terms.
- Safeguarding is integral to health and safety. Concerns about abuse, neglect, exploitation or radicalisation are reported at once to the Designated Safeguarding Lead – please see our Safeguarding Policy for further information.
- Online safety is managed through clear conduct rules for live sessions, use of official platforms and accounts, consent for recording, and swift action on misuse – please see our E-Safety and Acceptable Use Policy for further information.
- We promote respectful behaviour and do not tolerate bullying, harassment, hate incidents or sexual misconduct – please see our Anti-Bullying and Harassment Policy for further information.
- Our approach reflects the Safe Learner Framework, first developed by the Learning and Skills Council. Learners build personal competence in health and safety by understanding hazards, following instructions, using equipment correctly, and speaking up early when something feels wrong. Supervision is regular and effective. A named tutor, assessor, mentor or workplace supervisor oversees activities, models safe behaviour, checks understanding, and intervenes when conditions change.
- The learning environment must be safe, healthy and supportive. Classrooms and workshops are maintained to agreed standards, online platforms are secure, and employer premises are checked before use. Tasks are assessed for risk, and suitable controls are put in place. Learners are told about the risks that relate to the tasks they will perform and how those risks will be managed. Where higher-risk activity is



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planned, training and supervision are increased, and competence is confirmed before the task begins.

- As the funded organisation, Pathways LDN holds a core responsibility for each learner's health, safety and welfare. We complete placement checks, brief learners and employers, and monitor delivery. For work-based learning, employers share responsibility and **must** meet agreed standards for supervision, induction, safe systems of work, insurance and incident reporting. Effective communication between Pathways LDN and each employer is essential. We exchange risk information, agree on roles before a placement starts, and keep in touch through reviews so that expectations stay aligned.
- First aid cover is provided at delivery sites and on placements. Each venue has a named first aider, stocked kits, and a clear process for calling 999. Learners are required to tell us about medical needs that may affect safety, for example, allergies, epilepsy or asthma, and we plan around them.
- Accidents, near misses and violent incidents are recorded the same day, investigated promptly, and reported under RIDDOR where required. Learning from incidents is shared in tutor briefings and employer reviews, with corrective actions tracked to completion.
- Fire safety arrangements are explained at the start of each programme. Exits, alarms and assembly points are shown, and drills are carried out by venue managers according to local schedules.
- Everyone shares responsibility for safety. Tutors and assessors lead daily checks and stop activity if conditions are unsafe. Learners follow instructions, report hazards, and take an active role in their own safety. Employers cooperate by providing accurate risk information, supervision and timely incident reports. These arrangements meet our duties under health and safety law and align with safeguarding guidance for education and training settings.



Monitoring

Monitoring aims primarily at the prevention of accidents, ill health, and other forms of incidents that present any potential loss of opportunity to Pathways LDN and its stakeholders.

Active monitoring techniques include safety tours, safety inspections, and safety audits, which are used to ensure that hazards are identified so that safe systems of work are implemented.

Reactive monitoring techniques include accident, incident, and dangerous occurrence investigations and subsequent reviews of how such occurrences were managed, learning from experience where appropriate.

Monitoring may also include reviewing our standards and statistical data against regional and national standards.

Reviewing

Pathways LDN Ltd. is committed to ensuring our policies are effective and up-to-date.

The Directors are responsible for this process and will review this policy at least once a year or more frequently if needed due to changes in laws, regulatory guidance, or best practice.

This policy will be made available in other formats upon request, and all learners are encouraged to speak to any member of staff if they have any questions or require clarification.



Appendix A: HSE Guidance

- For further information on VDU use, visit <https://www.hse.gov.uk/msd/dse/> or download the leaflet at [Working with display screen equipment \(DSE\)](#)
- For further information on manual handling, visit <https://www.hse.gov.uk/msd/manual-handling/index.htm> or download the leaflet at [Manual handling at work](#)
- For further information on COSHH, visit <https://www.hse.gov.uk/coshh/>
- For more information on slips and trips, visit <https://www.hse.gov.uk/slips/>
- For more information on RIDDOR, visit <https://www.hse.gov.uk/riddor/>
- For more information on stress and mental health, visit <https://www.hse.gov.uk/stress/>
- For more information on risk assessment, visit <https://www.hse.gov.uk/simple-health-safety/risk/>