

Health, Safety & Welfare Policy

Applicability

This policy applies to all divisions, subsidiaries, departments, and associated organisations within Twin. It is binding on all employees, contractors, and stakeholders engaged in activities on behalf of the Group, regardless of business unit or location. All members of the Group are expected to adhere to the principles, standards, and requirements set out herein.

Archbury Holdings Limited has adopted this policy of Twin Training International Limited at acquisition of some of its subsidiaries. These policies remain in place until December 2026. Over this time Archbury Holdings Limited will review these arrangements and implement its own policy

Introduction

Twin is committed to providing and maintaining a safe, healthy, and supportive environment for all staff, learners, visitors, contractors, and other persons who may be affected by its activities.

Health and safety is integral to all operational and educational delivery. This policy sets out the organisation's arrangements for managing risk, promoting the "Safe Learner" concept, and ensuring compliance with relevant statutory requirements.

All staff have a duty to take reasonable care of their own health and safety and that of others, and to cooperate with the organisation in implementing this policy.

Policy Statement

Twin will:

- Provide and maintain safe and healthy working and learning environments
- Identify, assess, and control risks arising from its activities
- Ensure appropriate training, information, instruction, and supervision is provided
- Promote a positive safety culture through the "Safe Learner" approach
- Monitor, review, and continually improve health and safety performance
- Ensure compliance with relevant legislation including the Health and Safety at Work etc. Act 1974 and associated regulations

Contents

1. Organisation and Responsibilities	3
1.1 Directorate	3
1.2 Safety Officer / Health & Safety Lead	3
1.3 Health & Safety Representative	3
1.4 Site Managers (usually also the H&S Representative)	3
1.5 Staff	4
1.6 Learners	4
1.7 Employers / Hosts Responsibilities	4
2. Monitoring, Auditing and Review	5
3. Safe Learner Approach	5
4. Embedding Health and Safety in Learning	6
4.1 Tutorials and Reviews	6
5. Risk Assessment	6
5.1 Process	6
5.2 Risk Rating	7
5.3 Review	7
5.4 Health and Safety Documentation and Approved Forms	7
6. Incident, Accident and Near Miss Reporting	8
7. Emergency Procedures	8
7.1 Fire and Evacuation	8
7.2 People with disabilities	9
8. Visitors and Contractors	9
8.1 Visitors	9
8.2 Contractors	9
9. Educational Visits, Work Experience and Outreach	10
10. First Aid	10
11. Hazard Reporting	11
12. Health and Safety in Equipment and Learning Spaces	11
13. Conclusion	11

1. Organisation and Responsibilities

1.1 Directorate

The Directorate holds ultimate responsibility for health and safety within the organisation and ensures adequate resources are available for implementation of this policy.

1.2 Safety Officer / Health & Safety Lead

The Safety Officer / Health & Safety Lead is responsible for overseeing health, safety, and welfare compliance across the organisation, including:

- Maintaining, reviewing, and updating health, safety, and welfare procedures
- Conducting inspections, monitoring activity, and leading investigations where required
- Liaising with external agencies and regulators as appropriate
- Reviewing audit findings and monitoring compliance across sites and provision
- Identifying trends, risks, and areas for improvement and recommending actions
- Ensuring corrective and preventative actions are implemented and followed through
- Maintaining the Approved Contractors Register
- Reporting findings, risks, and recommendations to senior management

1.3 Health & Safety Representative

Responsible for:

- Day-to-day site safety arrangements
- Contractor liaison and permit-to-work systems
- Fire safety systems and evacuation readiness
- Site inspections and maintenance coordination

1.4 Site Managers (usually also the H&S Representative)

Responsible for:

- Implementing health and safety procedures within their areas
- Ensuring staff compliance and training
- Ensuring risk assessments are completed and reviewed
- Investigating incidents and ensuring corrective actions

1.5 Staff

All staff must:

- Follow health and safety procedures
- Report hazards, incidents, and near misses promptly
- Cooperate with training and risk control measures
- Support the promotion of safe learner behaviour

1.6 Learners

Learners are expected to:

- Follow instructions and safety rules
- Take responsibility for their own actions
- Report hazards or concerns
- Participate in safe learning practices

1.7 Employers / Hosts Responsibilities

Where services are delivered in partnership with external employers, placement providers, contractors, or host organisations, Twin requires all such organisations to take reasonable and appropriate steps to ensure the health, safety and welfare of Twin staff, learners, and any other persons affected by their activities.

Employers and hosts must:

- Ensure they have suitable and sufficient Health and Safety arrangements in place, including a written Health and Safety policy where legally required.
- Carry out and maintain appropriate risk assessments relevant to the activities undertaken by Twin staff or learners on their premises.
- Provide adequate induction, supervision, and ongoing instruction relating to site-specific hazards and control measures.
- Communicate clearly any known risks, incidents, or changes in working practices that may affect health and safety.
- Ensure appropriate emergency procedures are in place, including fire evacuation, first aid provision, and accident reporting arrangements.

- Co-operate fully with Twin in relation to safeguarding, welfare, and incident investigation procedures.
- Ensure that any specialist requirements (e.g. PPE, restricted access areas, or competency requirements) are identified and agreed prior to commencement of activity.

Twin reserves the right to withdraw staff or learners from any employer or host site where reasonable concerns regarding health, safety, or welfare arrangements are identified and not adequately addressed.

All employer/host arrangements will be subject to periodic review to ensure continued compliance and suitability for placement or service delivery.

2. Monitoring, Auditing and Review

The organisation operates a structured system of:

- Informal monitoring through inspections, spot checks, and compliance reviews
- Review of findings by the Health, Safety and Welfare Group
- Reporting of recommendations to senior leadership for action

Risk controls and procedures are reviewed:

- Following incidents or near misses
- When changes in activity or legislation occur
- At defined review intervals (minimum annually or sooner where required)

3. Safe Learner Approach

Twin promotes a Safe Learner approach where health and safety is embedded throughout learning and workplace activity. Learners are supported to develop awareness of risks and take responsibility for their own safety and the safety of others.

Learners will:

- Develop awareness of health and safety responsibilities in learning and the workplace
- Learn how to identify and manage everyday risks
- Build safe working behaviours that can be applied in employment
- Be supported to learn in a safe and appropriate environment

4. Embedding Health and Safety in Learning

Health and safety is introduced at the start of the learner journey and reinforced throughout programme delivery, reviews, and learner interactions where appropriate. Teaching and delivery staff ensure learners are aware of their responsibilities and understand how to learn and work safely.

Key themes include:

- Personal responsibility for health and safety
- What to do in the event of an emergency
- How to report accidents, incidents, hazards, or concerns
- Safe use of equipment, resources, and digital systems
- Expected behaviours within learning and workplace environments
- Risks relevant to the learner's programme, job role, or learning environment

This approach helps learners develop an ongoing awareness of health and safety and supports the creation of safe and positive learning environments.

4.1 Tutorials and Reviews

Learners receive regular progress and/or welfare reviews which may identify:

- Personal or safeguarding concerns
- Attendance or engagement issues
- Support needs

All information is managed in accordance with data protection requirements.

5. Risk Assessment

Risk assessment is central to Twin's health and safety management system.

5.1 Process

Risk assessment involves:

- Identifying hazards
- Evaluating risk (likelihood and severity)

- Implementing control measures
- Recording findings
- Monitoring and reviewing effectiveness

5.2 Risk Rating

Risk is calculated using:

- Number of persons affected
- Severity of harm
- Likelihood of occurrence

Control measures follow the hierarchy:

1. Elimination
2. Substitution
3. Isolation
4. Reduction of exposure
5. Safe systems of work
6. Training and supervision
7. Personal protective equipment (PPE)

5.3 Review

Risk assessments are reviewed:

- When circumstances change
- Following incidents
- At least annually or within defined review periods
- Where monitoring identifies concerns

5.4 Health and Safety Documentation and Approved Forms

Twin maintains a suite of approved Health and Safety forms and templates to support the consistent implementation, recording and monitoring of Health and Safety processes across all areas of the organisation.

These forms provide managers and staff with the required documentation to support effective risk management, compliance monitoring and audit assurance. They ensure that key Health and Safety activities are appropriately recorded, including risk assessments, workplace checks, incident reporting, learner activity assessments, workplace vetting and other relevant safety processes.

All approved Health and Safety forms and templates are available via the Gateway site and should be accessed directly from this location to ensure staff are using the most current approved versions. Managers are responsible for ensuring that appropriate records are completed, maintained and available as evidence of compliance with Health and Safety requirements.

Any locally stored or outdated versions of Health and Safety forms should be removed and replaced with the current approved templates published on the Gateway site.

6. Incident, Accident and Near Miss Reporting

All incidents must be:

- Reported immediately
- Recorded using approved reporting systems
- Investigated proportionately to severity and risk

Investigations will:

- Identify root and contributory causes
- Determine corrective and preventive actions
- Ensure actions are implemented and reviewed

Serious incidents are escalated to senior management and reported under statutory requirements where applicable.

7. Emergency Procedures

7.1 Fire and Evacuation

In the event of fire:

- Raise alarm immediately
- Evacuate via nearest safe exit
- Proceed to designated assembly point
- Do not re-enter until authorised

Fire wardens are responsible for:

- Sweeping designated areas
- Ensuring safe evacuation
- Reporting status to H&S Representative

7.2 People with disabilities

Assistance is provided through:

- Safe refuge areas
- Staff support during evacuation
- Liaison with emergency services where required

8. Visitors and Contractors

8.1 Visitors

All visitors and contractors must:

- Sign in and follow site procedures
- Comply with health and safety rules
- Be supervised or escorted where required

8.2 Contractors

Contractors must:

- Provide evidence of competence and insurance
- Follow permit-to-work systems where applicable
- Submit method statements for high-risk activities
- Maintain safe working environments and housekeeping standards

Work may include (but is not limited to):

- Electrical work
- Gas work
- Working at height
- Excavation

- Hot works
- Hazardous substances

9. Educational Visits, Work Experience and Outreach

All off-site learning activities must be:

- Risk assessed in advance
- Approved by appropriate management
- Supported by adequate staffing and supervision ratios

Work placements must ensure:

- Employer suitability and safety systems are in place
- Clear learning objectives are defined
- Emergency contact arrangements exist
- Students receive pre-placement preparation and briefing

For apprenticeship provision, there are established Health and Safety workplace vetting arrangements to ensure employer workplaces are suitable and safe environments for apprentices. The workplace vetting process includes appropriate checks, review of employer health and safety arrangements, identification of relevant risks and confirmation that suitable controls are in place. The process is supported by documented procedures and records to evidence employer suitability and ongoing monitoring where required.

10. First Aid

Twin ensures:

- First aid provision is available across all sites
- Appointed persons are trained and accessible
- First aid kits are maintained and located appropriately

Staff must:

- Report all injuries
- Ensure appropriate treatment is given
- Complete incident documentation following any treatment

11. Hazard Reporting

All staff and learners must report hazards promptly using approved reporting systems.

Hazards include:

- Slips, trips and falls
- Faulty equipment
- Fire risks
- Contractor-related hazards
- Poor lighting or visibility
- Near misses

Hazards are assessed, prioritised, and actioned based on risk level.

12. Health and Safety in Equipment and Learning Spaces

Where interactive or specialist equipment is used:

- Equipment must be installed safely and maintained
- Electrical and cabling risks must be controlled
- Users must be trained in safe operation
- Projection equipment must be used safely to avoid eye exposure risks

13. Conclusion

This policy provides the framework for managing health, safety, and welfare across all Twin activities. Compliance with these procedures is mandatory and is essential to ensuring the safety of all learners, staff, visitors, and contractors.

The organisation is committed to continuous improvement and maintaining a strong safety culture through monitoring, training, and active engagement with all stakeholders.