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Document Title: Health and Safety Policy	Date of Next Review: See BP23 Compliance Assurance Schedule	
Version: 3.0	Author: K. Smith	

Change Log (for changes prior to 2021 please see the Archive Change Log at the end of this policy)				
Date:	Change Description:	Proposed:	Actioned:	Approved:
14 Jan 2021	<ul style="list-style-type: none"> <li>Updated to capture that H&amp;S Check (CL12) may be re-issued to learners if change in work location</li> </ul>	Standardisation Meeting	HL	
8 <sup>th</sup> June 2021	<ul style="list-style-type: none"> <li>Updated to insert references to Capella's C19 Testing Procedure</li> </ul>	HL	HL	
28 <sup>th</sup> September 2021	<ul style="list-style-type: none"> <li>Updated Document Classification</li> <li>Updated to refer to apprentices/delegates throughout (Compliance Assurance Finding)</li> <li>Changes following review for RoATP re-application</li> </ul>	HL	HL	
5 <sup>th</sup> October 2021	<ul style="list-style-type: none"> <li>Updated to insert ref to completing Risk Based PAT Testing of Equipment</li> </ul>	KS/NC	HL	
21 <sup>st</sup> December 21	<ul style="list-style-type: none"> <li>Updated following review by Solvendis prior to RoATP reapplication</li> </ul>	KS	HL 18/12/2021	
30 <sup>th</sup> March 2022	<ul style="list-style-type: none"> <li>Updated to reflect requirements of a client</li> <li>Updated to remove references to C19 testing and risk assessments but to insert generic comment regarding following gov/nhs guidance</li> </ul>	H.Lees 29/03/22	H.Lees 30/03/22	
27 <sup>th</sup> September 2022	<ul style="list-style-type: none"> <li>Minor updates to drafting to reflect current practice following completion of 2022 Compliance Assurance Review</li> </ul>	H.Lees 28/07/22	H.Lees 28/07/22	
5 <sup>th</sup> September 2023	<ul style="list-style-type: none"> <li>Inserted HSE Risk Assessment into the Policy as Appendix 1</li> <li>Inserted Link to DSE Assessment</li> <li>Removed references to Smart Assessor and ILP as no longer used (replaced by OneFile and Training Plan respectively)</li> </ul>	C.Hughes 23/03/23	H.Lees 05/09/23	

## Purpose

The purpose of this Health & Safety (H&S) policy is to set out the intentions and key tools that Capella use to ensure that:

- Capella complies with all relevant H&S legislation
- H&S considerations are incorporated into all our business and training activities
- H&S incidents are appropriately recorded in line with relevant regulations
- Appropriate mitigating action is taken to address any H&S issues arising

It includes:

- A statement of commitment regarding the Health and Safety of our Associates and of apprentices/delegates in our care
- The lines of responsibility for Health and Safety in our organisation
- How we promote the policy to apprentices/delegates and Associates
- How we obtain commitment to the policy from apprentices/delegates, their employers' and our Associates
- Information regarding the training we provide to our Associates with regards to the implementation of this policy
- How we identify, record and manage Health & Safety accidents, incidents, near-misses, concerns and risks
- Our procedure for accident or ill health of apprentices/delegates
- Our absence reporting arrangements
- Our arrangements for reviewing this policy
- A copy of our H&S Risk Assessment (see Appendix 1), which is reviewed annually as part of the annual policy review

### **Policy Owner and lines of responsibility for H&S**

The Managing Partner has overall responsibility for H&S within Capella Associates Ltd, including responsibility for this policy. The Capella MANAGING PARTNER's contact details are detailed below:

Capella Managing Partner: Kate Smith  
Email: [kate.smith@capellaassociates.com](mailto:kate.smith@capellaassociates.com)  
Tel No: 07968 344764

### **Commitment to the H&S Policy**

Capella Associates Ltd is committed to ensuring the mental and physical health, safety and welfare of apprentices/delegates and Associates.

All Capella Associates must, at all times:

- take personal responsibility for their own actions;
- act in a safe manner; and

- be aware of, and work within, Capella's H&S Policy. Compliance with Capella's H&S Policy forms part of the Capella Associate Contract of Engagement.

Capella expects all Apprentices/Delegates to work in accordance with H&S information and training that has been provided to them by their employer, and/or Capella Associates, in order to ensure their own safety and that of other apprentices/delegates, our Associates and others. In addition, we request that all apprentices/delegates take personal responsibility for their own actions, and act in a safe manner, at all times.

Capella's Code of Conduct for Apprentices/Delegates (see Appendix 2 of Capella's Attendance Policy, a copy of which is on Capella's website) includes information relating to H&S, and all apprentices/delegates are required to sign the Code of Conduct at the commencement of their training.

In order to ensure that the employers of apprentices/delegates understand their responsibilities appertaining to the H&S of apprentices/delegates we:

- communicate relevant H&S information in our contractual and enrolment documentation
- obtain details of the employer's Health and Safety representative during the contracting phase, in order to ensure we have a key point of contact with regards to H&S matters.

In order to ensure that H&S is incorporated appropriately into the provision of goods/services to Capella, including the provision of sub-contracted training, we include consideration of H&S risks in our Provider Assessment (BP20) and our Sub-Contractor Contract Review Templates (BP33 and BP53).

### **Promotion of the H&S Policy**

All Capella Associates are made aware of this policy:

- at the contracting stage (the Capella Associate Contract explicitly refers to the H&S policy and requires Associates to comply with the policy)
- as part of their induction training; and
- each time the policy is updated/reviewed, which is at least annually.

In addition:

- Safe Operation is also listed on the template Skills Matrix, which is reviewed during the Associate Contract Review process which takes place at least annually.

- H&S is a standing agenda item at Capella Leadership Team Meetings and Capella Advisory Board Meetings.

Apprentices/delegates, and their employers, are made aware of Capella's H&S Policy as part of the onboarding and contracting processes respectively. A copy of Capella's H&S Policy is also available on Capella's website (<https://capellaassociates.com/company/capella-policies> )

### **How Capella identify and manage H&S Concerns**

Capella take a preventative and measured risk assessment approach to H&S, via which we aim to avoid H&S problems arising.

Capella has no offices (all Capella Associates are home-based) nor training facilities. Capella Training Programmes are therefore either conducted:

- at an employer's premises or
- at an external venue hired for that purpose, or
- online
- or a combination of online and at employer's premises or an external venue.

As such, Capella work within the H&S guidelines of the apprentices/delegates employer(s) and, where applicable, external training venues.

Capella uses the following tools to identify, record and manage H&S Concerns:

- **Safety Register (BP18)**

All Capella Associates are required to record details of all H&S accidents, incidents or near-misses that occur during Capella's scheduled training and review sessions, or at any other time during the working day, in Capella's Safety Register (BP18) in a timely manner.

Capella will always inform the employer concerned if an accident, incident or near-miss occurred on their site and/or involved one of their apprentices/delegates. At a minimum the employer will be made aware of the following information:

- Date and time of incident/near miss
- Name of the apprentice(s)/delegate(s) and/or Capella Team Member(s) involved
- Location of incident/near miss
- Reason for the incident/near miss
- Supporting evidence/witnesses
- Actions/next steps

Where incidents or near misses occur on an employers' site, Capella expect the employers' own reporting procedures to be followed. We expect to be informed, where appropriate, of the outcome of any such reporting procedure in order that we better understand the hazards and risks faced by apprentices/delegates.

Investigations may take place depending on the nature and criticality of an incident. Subsequent lessons learnt or new risks identified are noted at Capella Leadership Team Meetings and, where appropriate, are entered in the Safety Register, risk register or Continuous Improvement plan.

#### ○ **Associates' Induction Training**

The following H&S matters are covered as part of an Associate's Induction training as set out in the Induction Checklist (CL1):

- Capella's H&S Policy
- Process for capturing information regarding all H&S accidents/incidents/near-misses in Capella's Safety Register
- Capella's Safeguarding and Prevent Policy
- PPE requirements
- Any allergies or other support requirements that the Associate may have that Capella needs to be aware of (details of these are captured on the Associate's entry in the Single Central Record)
- Any safety requirements relating to specialist equipment/resources that the Associate may need to use
- Safe Working
- Provision of the Associate's Emergency Contact Details

In addition, Capella recommends that Associate's regularly complete a Display Screen Equipment Assessment ([Working safely with display screen equipment: Overview - HSE](#)), and that they all have all relevant electrical equipment PAT Tested on a regular basis. Capella takes a risk-based approach to the PAT Testing of Capella equipment, and of equipment used by Capella Associates to complete work for Capella.

#### ○ **Health and Safety Checklist (CL12)**

Capella have a H&S Checklist (CL12) which we issue to all employers for their completion and return prior to Launch. We request that the apprentice/delegate is involved in the completion of the checklist so that they understand the risks in their own workplace, and we ask them to review the H&S Checklist as part of the apprenticeship programme launch and at Mid Review. In addition, we request that the employer provides us with relevant supporting document (eg copy of Employer's Insurance Certificates) alongside the completed H&S Checklist.

Upon return of the completed H&S Checklist a Capella Associate reviews the completed document to identify any actions/recommendations that may be required, and then subsequently reviews completion of the required actions/recommendations.

If the Associate has any concerns regarding the information provided on the completed H&S Checklist they are required to raise these with the Managing Partner and the Operations Director for their consideration and progression. A record of the discussions and any action taken/requested is maintained on the H&S Checklist.

Confirmation is sought at Programme, Business and Employer Review Meetings that:

- any actions recommended for progression on the H&S Checklist completed at Launch have been completed
- no changes that could affect the H&S of apprentices/delegates (eg change in working location/conditions) have been undertaken since the H&S Checklist was last completed. If such changes are identified, the employer may be required to recomplete the H&S Checklist.

The H&S Checklist is reviewed/updated at least annually, and is included in Capella's annual Compliance Assurance schedule (BP23).

○ **Capella Programme Go Ahead document (ProGo, CL3)**

Capella uses a Programme Go Ahead document to ensure that all required activities for a Programme are completed in a timely manner. The ProGo includes checks relating to H&S (eg is the room size adequate; has the Venue Checklist, which includes checks relating to H&S, been completed).

○ **Risk Assessments**

Capella undertakes Risk Assessments (RA2) for young apprentices/delegates (who are defined in Keeping Children Safe in Education as aged under 18) and/or vulnerable apprentices/delegates. Further details regarding this Risk Assessment can be found in Capella's Safeguarding and Prevent Policy.

Capella has also completed an HSE Risk Assessment relating to the work undertaken by Capella Associates. A copy of the Risk Assessment, which is reviewed annually as part of the review of this H&S Policy, is included in this Policy (see Appendix 1).

○ **Objective Setting and Review**

Capella review all aspects of H&S as part of our annual Objective Setting process, and our 6 monthly Objective Setting Review process.

○ **Capella Leadership Team Meetings and Advisory Board Meetings**

H&S is a standing agenda item at Capella Leadership Team Meetings and Capella Advisory Board Meetings.

As part of the Leadership Team Meeting agenda:

- A review of Capella's Safety Register (BP18) is undertaken, including quarterly analysis to identify any trends/systemic issues that may require additional assessment/countermeasures
- Any changes to H&S Legislation, Guidelines, etc that have been published (eg by the HSE, ESFA, IFATE) are considered, and any action arising is agreed (eg communication to Associates and/or apprentices/delegates/employers).

Key information from Capella's Leadership Team Meetings, including information relating to H&S, is cascaded to all Associates by their Team Leaders following each Leadership Team Meeting.

As part of the Advisory Board agenda:

- H&S Matters arising from other scheduled meetings, that are relevant specifically to Governance/Ofsted, are shared
- Feedback on trend analysis of incidents logged within the Health and Safety Register is presented
- Actions taken to build/improve Capella's work in this area are discussed.

#### ○ **Communication**

Capella encourages open communication with Associates, apprentices/delegates and their employers regarding H&S matters in order to drive improvements in H&S and to support the implementation of this Policy.

Through our communication with employers and external venues, we ensure that we are aware of the H&S contact for each employer and venue, and of the employers'/venue's H&S guidelines. We ensure that we follow these guidelines, and, where applicable, we identify how these relate to the relevant Apprenticeship Standard.

All Associates are required to be vigilant at all times with regards to H&S, and to communicate in a timely manner any issues or concerns, incidents or near-misses that they may have, or be aware of, to the Managing Partner for inclusion in the Safety Register (BP18) or, where applicable, the Safeguarding and Prevent Concerns and Incidents Log.

Capella ensure that the topic of mental and physical health, safety and welfare is highlighted at the beginning of all training programmes, and we provide information/resources on physical health, safety and welfare for

apprentices/delegates and their employers on our website: [Support : Capella Associates Resources \(freshdesk.com\)](https://www.freshdesk.com/support/capella)

#### ○ **Monitoring of Attendance**

Capella acknowledges that attendance and non-attendance can be an indicator of a H&S matter and/or Safeguarding matter, and we therefore monitor, and report to employers' regarding, the attendance of our apprentices/delegates'. Please see Capella's Attendance Policy for further information.

Where an apprentice/delegate takes a Break in Learning we record the reasons for this break (eg health issue) within the relevant documentation.

A report on the attendance of apprentices/delegates is presented at each Capella Advisory Board meeting, which typically takes place quarterly.

#### **Procedure for accident or ill health of apprentices/delegates**

Should an apprentice/delegate become unwell, or appear to become unwell, during a remote training session (eg whilst on a Microsoft Teams call) the following procedure will be followed by the trainer:

- The Associate will access the Emergency Contact Details for the apprentice/delegate from the Learner Management System (eg OneFile)
- The Associate will contact the apprentice's/delegate's Emergency Contact and request them to check on the apprentice/delegate
- If the apprentice's/delegate's Emergency Contact is not available and urgent action is deemed to be required the Associate will contact 999 and provide the Emergency Services with the apprentice's/delegate's location/address
- The Associate will contact the apprentice's/delegate's Manager and/or HR Contact to make them aware, using the contact details available for these individuals on the Training Plan.

If the remote training session is being provided by a sub-contracted 3<sup>rd</sup> Party Training Provider (rather than an Associate) they must contact the Operations Director to request that he obtains the required Emergency Contact Details.

Should an apprentice/delegate become unwell whilst attending a Face to Face training session at a physical venue (eg hotel or employer's site), the following procedure will be followed by the trainer:

- The Associate or sub-contracted 3<sup>rd</sup> Party Training Provider (as applicable) will follow the venue's emergency arrangements (eg request Hotel Reception to send First Aider and call 999 etc)
- The Associate or sub-contracted 3<sup>rd</sup> Party Training Provider (as applicable) will contact the apprentice's/delegate's Manager and/or HR Contact to make them aware, using the contact details available for these individuals on the Training Plan.



### **Review and Updates**

This policy, including the Risk Assessment contained in Appendix 1, will be reviewed at least annually. A record of the reviews is stored in the Change Log and the Archive Change Log that are contained within this policy. The Policy is re-issued to all Associates at each review, and a record of Associates' confirmation that they have read the updated policy is maintained.

#### *Related Policies*

- *Capella's Safeguarding and Prevent Policy*
- *Capella's Attendance Policy*
- *Capella's Delegate Support Policy*
- *Capella's Code of Conduct (for Associates)*
- *Capella's Code of Conduct (for Apprentices/Delegates)*

## **Appendix 1 - H&S Risk Assessment for Capella Associates**

**Company name: Capella Associates**

**Assessment carried out by: Helen Lees**

**Date assessment was carried out: 23/03/23    Date of next review: Quarter 1 2024**

At the date of the assessment Capella Associates comprises of 24 Associates, all of whom predominately work from home other than when attending client premises or other off-site venues to provide face to face training to apprentices and delegates or to attend meetings. The H&S Risk Assessment was completed by the Helen Lees (Compliance Assurance and Audit Manager) and was subsequently reviewed by Claire Hughes (Quality & Commercial Director) and Kate Smith (Managing Partner) and a representative member of each Capella sub-team, prior to being formally signed off by the Managing Partner.

The hazards detailed within the assessment were identified by:

- Noting things that might pose a risk within a typical home office environment
- Talking to a sample of Capella Associates to learn from their experiences
- Reviewing Capella's H&S Register (BP18) to identify any previous accidents or near-misses that have occurred (All Capella Associates are required to record details of all accidents, incidents or near-misses in the H&S Register)

A copy of the completed Risk Assessment is included as an Appendix in Capella's H&S Policy, which is reviewed annually and is circulated to all Capella Associates at each release. All Capella Associates are required to confirm that they have read Capella's H&S Policy upon each release.

The current live version of the H&S Policy is also available on Capella's 365 site for access by All Associates at any time.

H&S, including a review of Capella's H&S Register, is a standing agenda item at all Capella Senior Leadership Team Meetings (meetings held monthly) and at all Capella Advisory Board Meetings (meetings held quarterly). H&S matters may also be discussed at Capella Full Team Meetings (meetings held quarterly) where deemed appropriate by Capella's SLT and/or Capella's Advisory Board.

Capella have used the HSE's Risk Assessment Template (Published by the Health and Safety Executive in 11/19) as the basis for this Risk Assessment.







What are the hazards?	Who might be harmed and how?	What are you already doing to control the risks?	What further action do you need to take to control the risks?	Who needs to carry out the action?	When is the action needed by?	Done
<b>Slips and Trips</b>	Associates may be injured if they trip over objects or slip on spillages	Associates are aware that they should maintain general good housekeeping including ensuring work areas are well lit and there are no trailing leads/cables or obstructed walkways  Capella's Venue Checklist (which includes checks regarding slips & trips) is completed for all External Venues utilised by Capella	Circulate the completed Risk Assessment to all Associates for their information (and if applicable feedback) once the Assessment has been formally signed off by the Managing Partner	Compliance Assurance and Audit Manager	Q3 2023 (To be issued in the Q3 Policy and Documentation Update Bulletin)	Yes
<b>Manual handling of office equipment, paper etc</b>	Associates may be injured if they do not handle office equipment appropriately	Safe Operation is detailed within Capella's Skills Matrix, which is reviewed annually as part of the Contract Review process, and H&S matters are also covered as part of the Induction process	None	Not Applicable	Not Applicable	N/A
<b>Display Screen Equipment (DSE)</b>	Associates risk posture problems and pain/injuries (including eyesight issues) from overuse and/or improper use of DSE	Associates are made aware of the online DSE assessment that is available as part of their Induction Process and they are recommended to complete this periodically	Augment Capella's H&S Policy to include a link through to the DSE assessment website to make it easier for Associates to access this tool	Compliance Assurance & Audit Manager	Q2 2023	Yes
<b>Working at Height</b>	Associates may be injured if they fall from any height	Safe Operation is detailed within Capella's Skills Matrix, which is reviewed annually as part of the	None	Not Applicable	Not Applicable	N/A

What are the hazards?	Who might be harmed and how?	What are you already doing to control the risks?	What further action do you need to take to control the risks?	Who needs to carry out the action?	When is the action needed by?	Done
		Contract Review process, and H&S matters are also covered as part of the Induction process				
<b>Electrical</b>	Associates could injure themselves from using faulty electrical equipment	Associates are encouraged to get their electrical equipment PAT Tested regularly and access to a PAT testing service is made available at one Full Team Meeting per annum	None	Not Applicable	Not Applicable	N/A
<b>Fire</b>	Associates could suffer injuries if trapped in a fire	Capella's Venue Checklist (which includes checks regarding fire risks) is completed for all External Venues utilised by Capella	None	Not Applicable	Not Applicable	N/A
<b>Stress</b>	Associates could experience work-related stress which could be caused by a variety of factors eg isolation as a result of working from home, lack of clarity regarding roles and responsibilities, home/work/life balance	Associate Contracts contain Schedules which detail the Associate's Roles and Responsibilities; Associates have regular 1-2-1 meetings with their contract manager at which they are encouraged to raise any issues; Delegate and Associate Wellbeing is a standing agenda item at Capella SLT and Full Team Meetings; 2 Capella Associates have been appointed as Mental Health & Wellbeing Champions and they	Progress a Capella Away Day (Face to Face) during 2023 and if successful consider repeating annually going forwards  Explore the availability of, and funding for, Mental Health First Aid Training Courses for an Associate(s) to undertake	Managing Partner  DSL/DDSL	30/04/2023  31/12/2023	Yes  In Progress

What are the hazards?	Who might be harmed and how?	What are you already doing to control the risks?	What further action do you need to take to control the risks?	Who needs to carry out the action?	When is the action needed by?	Done
		<p>provide regular updates to Associates at team meetings etc; Regular Associate Surveys are undertaken to obtain feedback from Associates; 4 Full Team Meetings are held each year (2 Virtual and 2 Physical) and additional meetings are convened as required; Regular Sub-Team Meetings are held; Capella's Associate Code of Conduct details Capella's expectations with regards to behaviour – all Associates are required to sign this policy annually. An equivalent Code also exists for apprentices/delegates.</p>				
<b>Lone Working</b>	Associates could suffer injury or ill health whilst working alone (eg whilst working alone from home)	<p>Associates are encouraged to keep their online calendars up to date and to share their calendars with other Associates so that each Associates location is known</p> <p>Emergency Contact Details for Associates and their next of kin are held by Capella and these are reviewed annually as part of the Contract Review process</p>	None	Not Applicable	Not Applicable	N/A

What are the hazards?	Who might be harmed and how?	What are you already doing to control the risks?	What further action do you need to take to control the risks?	Who needs to carry out the action?	When is the action needed by?	Done
		<p>Capella hold at least 4 Full Team Meetings p/a (2 Virtual and 2 Physical) to enable Associates to have contact with each other in recognition of the fact that much of Capella's work is completed from home (lone-working)</p> <p>Sub-Team Meetings are held regularly (at least monthly) to ensure Associates have regular contact with their Contract Manager and colleagues</p>				

Archive Change Log				
Date:	Change Description:	Proposed:	Actioned:	Approved:
6 June 2016	<ul style="list-style-type: none"> <li>Addition of Safety Register as a key tool</li> <li>Addition of reference to Capella Team Meeting Standard Agenda to prompt regular review</li> <li>Addition of reference to Objective Setting/Review process</li> </ul>		KS	<i>KS</i>
13 Jan 2017	<ul style="list-style-type: none"> <li>Additions to list of tools to align with documented processes</li> </ul>		KS	<i>KS</i>
20 Feb 2017	<ul style="list-style-type: none"> <li>Reporting incidents to third parties - addition to list of tools and addition of appendix 1</li> </ul>	Team meeting	KS	<i>KS</i>
03 Oct 2017	<ul style="list-style-type: none"> <li>Addition of twice yearly checks of HSE website for new legislation to list of tools</li> </ul>	CH	CH	<i>CH</i>
20 Nov 2017	<ul style="list-style-type: none"> <li>Addition of Associates own PAT testing of electrical equipment to tools</li> </ul>	CH	CH	<i>CH</i>

18 Dec 2017	<ul style="list-style-type: none"> <li>Addition of reference to Approved Provider Register wrt PAT testing (Removed 13/09/19)</li> </ul>	KS	KS	
03 Oct 2018	<ul style="list-style-type: none"> <li>Policy reissued following annual review during audit – no changes</li> </ul>	KS	KS	
28 Nov 2018	<ul style="list-style-type: none"> <li>Slight amendment to tools</li> </ul>	KS	CH	
13 Sept 2019	<ul style="list-style-type: none"> <li>Additional content re: Apprenticeships and RoATP compliance</li> </ul>	SAB	KS	
17 Jan 2020	<ul style="list-style-type: none"> <li>Reissued after annual review – no changes made to policy</li> </ul>	HL	HL	
24 June 2020	<ul style="list-style-type: none"> <li>Insertion of new section regarding Emergency Contact Procedure as agreed at 05/06/20 Team Meeting</li> <li>Insertion of a reference to CL12 (H&amp;S Checklist) into the Tools Section and Deletion of Appendix 2 (Information relating to CL12)</li> <li>Deletion of Appendix 1 (Near Miss Reporting Form) and updating of drafting regarding Incident/Near Miss Reporting Procedure</li> </ul>	Team Meeting 05/06/20; Q1 2020 Internal Audit Findings	HL	
6 August 2020	<ul style="list-style-type: none"> <li>Insertion of specific references to mental health</li> </ul>	16/07/20 Mtg regarding KCSIE 2020	HL	