

Quality Assurance Policy Manual

MRG Services UK Ltd Policy

MRG Services UK Ltd Policy HEALTH & SAFETY POLICY STATEMENT OF INTENT (LEARNERS) (PART IV)

- 1.0. In accordance with the Health and Safety at Work Act etc 1974 and all other relevant Statutes, Regulations and Orders including, ESFA 2017 to 2018 Conditions of Funding MRG Services UK Ltd acknowledges its responsibility and using 'Safe Learner Blueprint' will provide and maintain, so far as it is reasonably practicable, training programmes that are in an environment that provides a healthy, safe, secure and supportive environment and commits to the protection of a vulnerable learner of any age.
- 2.0. In practice, this will mean MRG Services UK Ltd will:
 - 2.1. appraise all new placements (sub-contractors) with due regard to the health & safety of all learners under the legislation requirements of the employer and under the Health & Safety Standards (HASS)– Young People and vulnerable people.
 - 2.2. promote the awareness of possible vulnerable learners as well as the identification of a safeguarding manager with the necessary training, and links to external safeguarding agencies.
 - 2.3. ensuring that all learners are given adequate training and information on health and safety within their workplace.
 - 2.4. ensure that all employers are given adequate information/training on their short fall within the legislation of the placement, and the supervision necessary with learners to maintain a healthy, safe, secure and supportive working environment.
 - 2.5. ensure that the employer maintains buildings, environments, plant and machinery at an optimum level of safety.
 - 2.6. the employer provides the conditions in which safe work practices can be carried out, and equipment can be operated safely.
 - 2.7. ensure the employer makes all Managers/Supervisors aware of their responsibility for implementing the company health and safety policy with regards to learners especially the supervision of learners in the workplace and due regard to any vulnerable learner.
 - 2.8. ensure that employers allow monitoring by MRG Services UK Ltd, on the health and safety policy in force with supporting procedures and updating them as considered necessary with a view to seek assurance identifying actions for improvement in learner health and safety and will therefore contribute to the raising of standards.

Ref No:	PL18	Originator:	John Bradshaw
Section:	4 - H&S & Safeguarding	ISO Ref:	4.2.3.4
Date:	24/08/2018	Approved:	J McInerney
Revision:	1.0	Page:	1 Of 5

Quality Assurance Policy Manual

MRG Services UK Ltd Policy

3.0. Organisational responsibilities

3.1. Managing Director

Overall responsibility for ensuring that MRG Services UK Ltd sub-contractors and learners have been selected in line with all relevant safety legislation including the 'Safe Learner Blueprint' - Keeping children Safe in Education - (September 2018), health and safety procurement standards (HASS).

3.2. Health, Safety & Safeguarding Manager

Implementation of learner safety measures through HASS. Audit/monitor all locations with the purpose in the identification of trends in conjunction with the data obtained. Communication of 'Best Practice', new safety information from the HSE and present information gained to all heads and occupational assessors during department meeting.

3.3. Reginal New Business Officers

Set Risk Bandings plus the production of the future monitor SMART development plan. Close liaison with the employer/competent person, the learner and the learner(s) supervisor with due regard to all the health, safety & safeguarding issues pertaining to the sub-contractor's workplace and noted on the agreed SMART development plan after following HASS'. Identify that supervisors are aware of how to identify any vulnerable learner and the reporting chain pertaining to a vulnerable individual. Contact with the learner will be by direct contact or through close liaison with the occupational assessor, providing and extra layer in the 'Safe Learner Blueprint'.

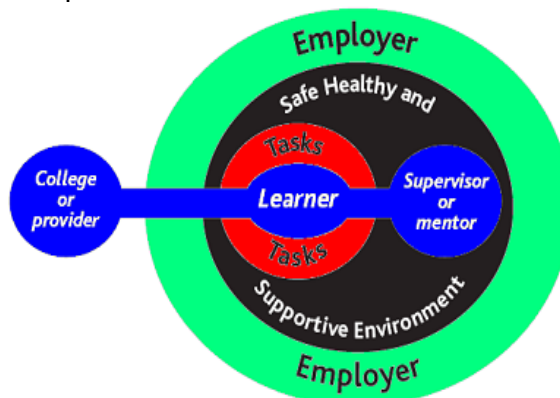


Figure 1 : The Safe Learner Framework for Work-based Learners

Ref No:	PL18	Originator:	John Bradshaw
Section:	4 - H&S & Safeguarding	ISO Ref:	4.2.3.4
Date:	24/08/2018	Approved:	J McInerney
Revision:	1.0	Page:	1 Of 5

Quality Assurance Policy Manual

MRG Services UK Ltd Policy

3.4. Heads of departments – Vocational Assessors

Follow Company procedure for the initial assessment noting any special needs, vulnerable people and or disability to enable a joint decision can be made in conjunction with the employer, supervisor, learner and safeguarding officer for any detailed requirements for the learner's safety.

Learners are aware of working within the work-based learning employer's health and safety policy and that the health and safety contained in the vocational unit conducted by the learner is carried out, understood and applied within the learner participation whilst at work.

Maintain a full living safety programme throughout the life of the programme with the use of literature, Company safety initiatives and forms part of the Company Review and Progress documentation.

Any member of the Company staff who notes any accident/incidents or learner concern over health, safety, welfare (including vulnerable people) is to be reported back to health & safety at Head Office. Monthly managers meetings with the passage of information will also go towards benefiting learner's safety.

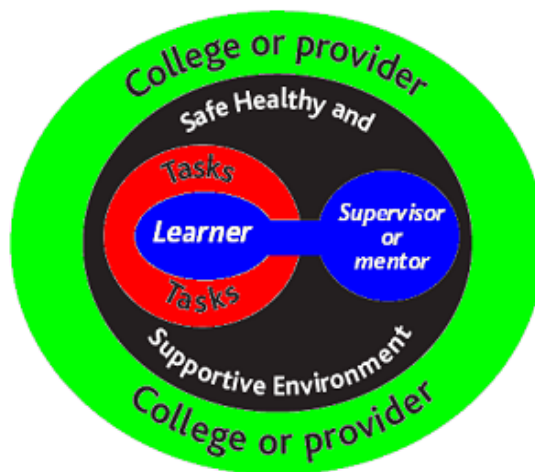


Figure 2 : The Safe Learner framework for 'In College' Training

4.0. Arrangements

Ref No:	PL18	Originator:	John Bradshaw
Section:	4 - H&S & Safeguarding	ISO Ref:	4.2.3.4
Date:	24/08/2018	Approved:	J McInerney
Revision:	1.0	Page:	1 Of 5

Quality Assurance Policy Manual

MRG Services UK Ltd Policy

- 4.1. **Health, Safety & Safeguarding.** Health & Safety is responsible for ensuring that this policy is being implemented uniformly on an on-going basis throughout all MRG Services UK Ltd activities.
- 4.2. Responsibility for co-ordinating the monitoring of all placements in line with the placement Risk Banding. The maintenance of a comprehensive telephone audit system and audits reports are maintained.
- 4.3. The responsibility to link with Reginal New Business Officers when dealing with high risk banded placements and organisations.
- 4.4. The responsibility to carry out audits of placements, reporting directly to the Managing Director on any non-conformance to the procedures contained in this Policy.
- 4.5. The responsibility to investigate all accidents, incidents and safeguarding issues involving any learners and liaise with the area ESFA (In relation to fatalities) and Health and Safety Executive (HSE) on the accident and assist in any follow up action.
- 4.6. **Reginal New Business Officers.** Reginal New Business Officers have responsibility for vetting new placements. This is to include a discussion covering health & safety management systems within the workplace with the employer, the competent person, and the learner with close liaison with the occupational assessor.
- 4.7. Guidance is taken from the Health & Safety at Work Act 1974 incorporating The Management of Health & Safety at Work Regulations 1999 (Reg 19) the protection of Young People at Work, Protection of Freedoms Act 2012 is taken into consideration when MRG Services UK Ltd takes on a new placement. The Acts will be brought to the attention of any employer and with a young person in the work place with what action has been taken by the employer and supervisor to conform to the Acts.
- 4.8. Responsibility for the monitoring of all placements is by the health and safety co-ordinator with dates taken from the company database according to external company risk banding.
- 4.9. All handouts covering health, safety matters must be quality checked by the health, safety and safeguarding manager.
- 4.10. Placements that are found to be unacceptable for Learners are to be brought to the attention of health & safety.
- 4.11. For external Company training venues, specific procedures will be in force along with this policy but containing detailed direction and information relevant to that training venue.
- 4.12. **Health & safety co-ordinator.** To report to the health, safety & safeguarding any issues pertaining to placement/subcontractors monitoring arrangements or other issues pertaining to the health & safety of any learner.
- 4.13. Update the health & safety database and the maintenance of a comprehensive health & safety telephone monitoring reports.

Ref No:	PL18	Originator:	John Bradshaw
Section:	4 - H&S & Safeguarding	ISO Ref:	4.2.3.4
Date:	24/08/2018	Approved:	J McInerney
Revision:	1.0	Page:	1 Of 5

Quality Assurance Policy Manual

MRG Services UK Ltd Policy

- 4.14. The recording of statistical information from accidents/incidents, dangerous occurrences or all safeguarding issues to learners.
- 4.15. **Managers/Heads of departments – Assessors.** Managers/Heads of Departments have overall responsibility for implementing learner safety throughout the life of a learner’s programme in conjunction with the learner’s supervisor. They are to ensure that assessors assigned to their area of operation, are following and implementing the safety contact with learners through the use of the “Review of Training and Progress” form. Assessors are to liaise with health, safety when they recognise their limitations of competence in regards to health, safety and safeguarding.
- 4.16. **Assessors.** Assessors have greater contact with work-based learners and are responsible for ensuring that they understand the Vocational Unit, ‘Health and Safety’ and be able to assist learners on all matters of health, safety and safeguarding. Assessors are to confirm that safe working practices and procedures within the learners’ work place are being carried out and recorded on every contact with the learners on the “Review of Training and Progress” form.
- 4.17. When matters arise outside the assessor’s remit or control or they recognise the limitations of their competence with regards to health, safety and safeguarding, the Assessor is to liaise with health & safety.

5.0 **Consultation with learners.** Health & safety and elected representative will consult the employer/subcontractor on matters affecting their learner’s health, safety & welfare in the work place.

Consultation with learners is provided by MRG Services UK Ltd representative	Work location
Managing Director in consultation with the health, safety & safeguarding – review the Health & Safety committee meeting minutes, safeguarding minutes with regard to future targets/actions.	MRG Services UK Ltd head office.
John Bradshaw Health & Safety	MRG Services UK Ltd head office.
TBC – Health & Safety Co-ordinator	Updates through employee representatives by information posted on the intranet for further dissemination on team meetings.
All Managers, department heads and Assessor / Tutors	Health & Safety issues pertaining to any sub-contractor or learner

Ref No:	PL18	Originator:	John Bradshaw
Section:	4 - H&S & Safeguarding	ISO Ref:	4.2.3.4
Date:	24/08/2018	Approved:	J McInerney
Revision:	1.0	Page:	1 Of 5

Quality Assurance Policy Manual

MRG Services UK Ltd Policy

5.0. Reporting Acts of Harassment, Bullying or Abuse. MRG Services UK Ltd aims to ensure the learning environments are supportive, where all individuals are treated with courtesy and respect and their contribution to the learning process is valued. The Company adopts the definition used in the Children Act 2004 and the DfES guidance document: '*Working Together to Safeguard Children*' - A guide to inter-agency working to safeguard and promote the welfare of children (March 2015) , which focuses on safeguarding and promoting children and young people's welfare and can be summarised as:

- 5.1.** Everyone who comes into contact with children and families has a role to play.¹ Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:
- protecting children from maltreatment;
 - preventing impairment of children's health or development;
 - ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
 - taking action to enable all children to have the best outcomes.

Local agencies, including the police and health services, also have a duty under section 11 of the Children Act 2004 to ensure that they consider the need to safeguard and promote the welfare of children when carrying out their functions. Under section 10 of the same Act, a similar range of agencies are required to cooperate with local authorities to promote the well-being of children in each local authority area. This cooperation should exist and be effective at all levels of the organisation, from strategic level through to operational delivery. Professionals working in agencies with these duties are responsible for ensuring that they fulfil their role and responsibilities in a manner consistent with the statutory duties of their employer.

5.2. The Company has equal regard and concern for safeguarding vulnerable adults who are not covered by child protection legislation and staff, should be aware of their responsibility towards vulnerable adults and to contribute to preventing further abuse if they are made aware of it.

5.3. The basis for the following is the Protection of Freedoms Act (2012)

5.4 A vulnerable adult is defined as someone:

- who is or may be in need of community care services by reason of mental or other disability, age or illness; and
- who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.

6.0. The Company will not tolerate harassment and bullying in any form with learners on 'in Company' programmes or incidents involving 'work-based learners' and will take firm and decisive action to protect the interests of its learners whenever incidents are identified.

7.0. The behaviours listed in this policy are not exhaustive, there may be other harassment practices that cause individuals to feel uncomfortable or are unwanted that will be acted upon under this policy. As such, all learners, staff and visitors to MRG Services UK Ltd will be made aware of this policy.

Ref No:	PL18	Originator:	John Bradshaw
Section:	4 - H&S & Safeguarding	ISO Ref:	4.2.3.4
Date:	24/08/2018	Approved:	J McNerney
Revision:	1.0	Page:	1 Of 5

Quality Assurance Policy Manual

MRG Services UK Ltd Policy

- 8.0. Definition of Bullying.** What is bullying - bullying is treating some-one differently because of who they are, not because of anything they have done. It is the persecution of an individual by another person or group of people. Bullying is the wilful, conscious desire to hurt, threaten or frighten someone else. Bullying involves dominance of one person by another, or group of others.
- 9.0.** The following are common examples of bullying, but not a complete list:
- Intimidation/threatening behaviour
 - Any form of physical abuse e.g. punching, kicking
 - Verbal abuse – shouting at, insulting, “putting down”
 - Psychological abuse – isolating an individual, preventing them from becoming part of a group or involved in certain activities
 - Anonymous letters or spreading rumours that are designed to upset
 - Demanding money
 - Demanding coursework to copy against a person’s will
 - Stealing, hiding or damaging belongings e.g. books, clothing, bags
 - Teasing people about their physical appearance
 - Intimidating or threatening email or text messages
- 10.0. Definition of Harassment.** What is harassment? - Harassment may be defined as any conduct that is unwanted by the recipient, or any conduct which affects the dignity of any individual, or group of individuals including cases where recipient is not offended or not present. Harassment may be repetitive, or an isolated occurrence against one or more individuals.
- 10.1. Physical Harassment includes** unwanted contact (e.g. unnecessary touching), assault or gestures, intimidation or aggressive behaviour.
- 10.2. Verbal Harassment includes** unwelcome remarks, suggestions and propositions, malicious gossip, jokes and banter which is based on a person’s sex or race or which refers to a person’s age, disability, sexuality, religion or personal appearance.
- 10.3. Non-verbal Harassment includes** offensive literature or pictures, graffiti and computer imagery, isolation or non-cooperation and exclusion from social activities.
- 10.4.** Harassment may be related to age, sex, race, disability, religion, nationality or any personal characteristic of the individual(s):

Ref No:	PL18	Originator:	John Bradshaw
Section:	4 - H&S & Safeguarding	ISO Ref:	4.2.3.4
Date:	24/08/2018	Approved:	J McInerney
Revision:	1.0	Page:	1 Of 5

Quality Assurance Policy Manual

MRG Services UK Ltd Policy

10.5. Disability Harassment

- threats, physical or verbal abuse against a person or group because of their disability
- jokes, mockery, unwarranted remarks, graffiti or innuendo which offends people on the grounds of their disability
- provocative behaviour, such as the wearing of badges, clothing or insignia which may offend
- display or circulation of offensive material (emails and texting)
- stereotyping

10.6 Racial Harassment

- threats, physical or verbal abuse against a person or group because of colour or ethnicity
- discrimination on the grounds of race, colour or ethnicity
- jokes, mockery, unwarranted remarks, graffiti or innuendo which offends people on the grounds of their colour, race or ethnicity
- provocative behaviour, such as the wearing of badges, clothing or insignia which may offend
- display or circulation of offensive material (emails and texting)
- stereotyping

10.7. Religious Harassment

- threats, physical or verbal abuse against a person or group because of their religion or belief
- jokes, mockery, unwarranted remarks, graffiti or innuendo which offends people on the grounds of religion or belief
- provocative behaviour, such as the wearing of badges, clothing or insignia which may offend
- display or circulation of offensive material (emails and texting)
- stereotyping

10.8. Gender Harassment

- threats, physical or verbal abuse against a person or group because of their gender
- discrimination on the grounds of gender
- jokes, mockery, unwarranted remarks, graffiti or innuendo which offends people on the grounds of their sexual orientation
- verbal or physical sexual advances which are coercive or unwelcome, whether they are intended to offend or not
- the use of stereotypes to demean either sex or derogatory or discriminatory statements referring to either sex
- display or circulation of sexually suggestive or offensive material, e.g. pin-ups (emails and texting)
- provocative behaviour, such as the wearing of badges, clothing or insignia which may offend

Ref No:	PL18	Originator:	John Bradshaw
Section:	4 - H&S & Safeguarding	ISO Ref:	4.2.3.4
Date:	24/08/2018	Approved:	J McNerney
Revision:	1.0	Page:	1 Of 5

Quality Assurance Policy Manual

MRG Services UK Ltd Policy

10.9 Sexual Orientation Harassment

- threats, physical or verbal abuse against a person or group because of their sexual orientation
- discrimination on the grounds of sexual orientation
- jokes, mockery, unwarranted remarks, graffiti or innuendo which offends people on the grounds of their sexual orientation
- provocative behaviour, such as the wearing of badges, clothing or insignia which may offend
- display or circulation of offensive material (emails and texting)
- stereotyping

10.10. Age Harassment

- threats, physical or verbal abuse against a person or group on the grounds of age
- jokes, mockery, unwarranted remarks, graffiti or innuendo which offends people on the grounds of their age
- provocative behaviour, such as the wearing of badges, clothing or insignia which may offend
- display or circulation of offensive material
- stereotyping

11.0. Some forms of harassment are illegal, and incidents which result in violations of the Health and Safety at Work Act 1974.

12.0. What do I do if I am bullying someone?

- Discuss it with your Personal Tutor, assessor or another member of staff of MRG. They will be able to assist you to find the help you need and will welcome the opportunity to help you to improve the way you and others behave towards each other in the Company or workplace.
- Learner Support is organised through the company safeguarding team, who can make a referral to an appropriate adviser, counsellor, or other relevant outside agency if required. Contact can be made through the Company reception (0800 085 3598) who will be able to direct you to the right member of staff or supply their email.

13.0. Any concern expressed by a learner to any member of MRG Services UK Ltd staff in areas such as Bullying, Sexual Discrimination, Abuse and Pay or anything outside the individual training plan, must be logged and reported directly to the Designated Safeguarding Person soonest.

14.0. On no account should a member of MRG Services UK Ltd staff try to resolve a problem on the spot. A reporting form is available on the intranet (FM146).

15.0. The Safeguarding Person, (if required) will seek the correct professional advice; draw up an action plan to present it to the safeguarding team at an arranged meeting (soonest).

Ref No:	PL18	Originator:	John Bradshaw
Section:	4 - H&S & Safeguarding	ISO Ref:	4.2.3.4
Date:	24/08/2018	Approved:	J McInerney
Revision:	1.0	Page:	1 Of 5

Quality Assurance Policy Manual

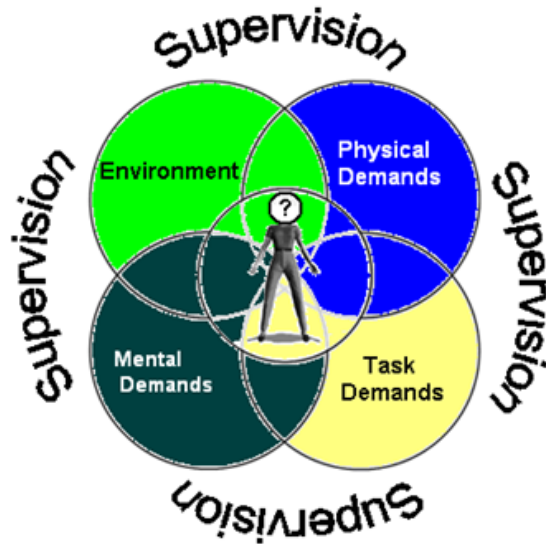
MRG Services UK Ltd Policy

- 16.0.** **Risk assessment (s) – Risk Control.** Risk Assessments either covering 'In house training' within MRG Services UK Ltd premises or for learners in 'Employed status' – Work based learning (WBL) must cover all activities that any learner will participate in the production of the assessments.
- 17.0.** The learner and supervisor must also have all the assessments brought to their attention by the competent person and explained. Any adjustment of a risk assessments with a learner with special needs, a disability, learning/language difficulty or is a young person', will be identified at the initial contact with the employer and learner and the appropriate adjustments made.

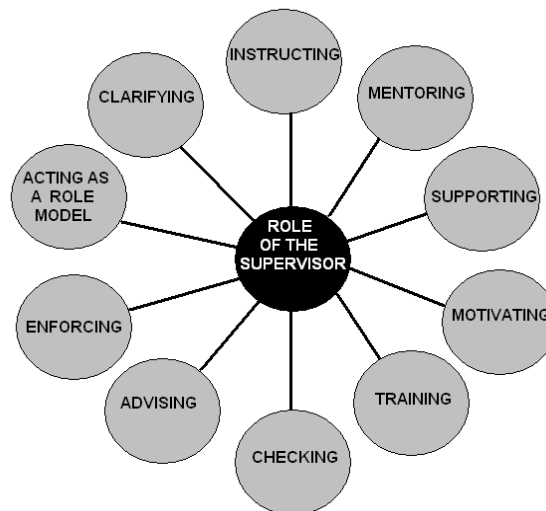
Ref No:	PL18	Originator:	John Bradshaw
Section:	4 - H&S & Safeguarding	ISO Ref:	4.2.3.4
Date:	24/08/2018	Approved:	J McInerney
Revision:	1.0	Page:	1 Of 5

Quality Assurance Policy Manual
MRG Services UK Ltd Policy

- 18.0. **Risk Control – Supervision of Learners.** The learner’s supervisor is the main link to the safety of a learner and must beware of the limitations of a young person in the work place.



- 19.0. Within the ‘Initial Assessment’ and the following ‘Monitors’ part of the risk control with learners safety is to interview the supervisors/tutor/team leaders and revise the principle of their 10 point role when dealing with a young person: -



- 20.0. **Accident/Incident reporting.** During the initial sign up of a learner, the employer is made aware of conforming to the Health and Safety at Work etc. Act 1974.
- 21.0. This is covered on the Company Agreement, which is updated on every telephone monitor as a ‘remind and revise’ process. The employer is to receive a copy of the agreement.

Ref No:	PL18	Originator:	John Bradshaw
Section:	4 - H&S & Safeguarding	ISO Ref:	4.2.3.4
Date:	24/08/2018	Approved:	J McNerney
Revision:	1.0	Page:	1 Of 5

Quality Assurance Policy Manual

MRG Services UK Ltd Policy

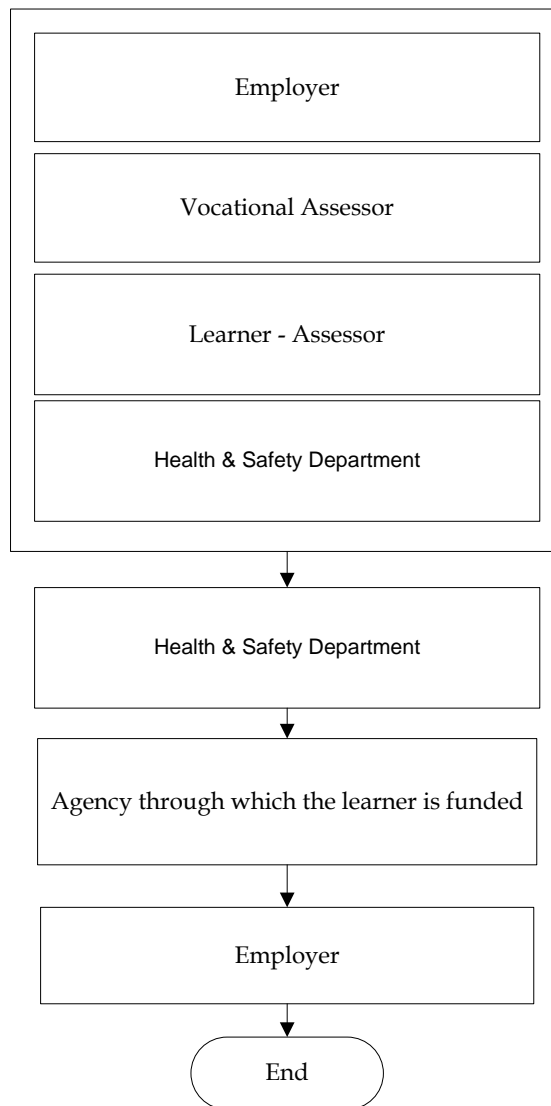
- 22.0.** The employer confirms that if a learner has an accident or contracts a disease in the workplace whilst participating on a Government funded programme, the employer is to inform MRG Services UK Ltd soonest.
- 23.0.** RIDDOR 2013 means the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013, will be followed when required for all incidents/accidents and that all sub-contractors are made aware of their obligations under this Regulation.
- 24.0.** **Accident/Incident reporting chain.** The reporting of any accident, near miss or dangerous occurrence pertaining to a learner whilst on any programme is also initiated by one of the following reporting process:-
- 24.1.** The employer.
 - 24.2.** The learner.
 - 24.3.** The assessor following the occupational assessors' meeting.
 - 24.4.** The assessor whilst in contact with the learner on a monthly basis.
- 25.0.** In the event of a learner fatality the ESFA will be informed immediately. All other reportable accidents, disease and investigation documents are to be completed within 10 working days on receipt of notification.
- 26.0.** A full investigation is then carried out incorporating MRG Services UK Ltd Accident Investigation Documents.
- 27.0.** If the accident is to an employed status trainee and is reportable under "RIDDOR", the employer is to provide a copy of the F2508/F2508A and confirm that the accident is recorded in the company accident book.
- 28.0.** On completion of MRG Services UK Ltd Accident investigation, forms documentation and any photographic evidence are to be filed for any further follow up investigation by outside agencies.
- 29.0.** Any further action from the investigation is noted and if required the level of the learner's workplace risk band is increased to allow more frequent monitoring of H&S concerns within the work place.

Ref No:	PL18	Originator:	John Bradshaw
Section:	4 - H&S & Safeguarding	ISO Ref:	4.2.3.4
Date:	24/08/2018	Approved:	J McInerney
Revision:	1.0	Page:	1 Of 5

Quality Assurance Policy Manual

MRG Services UK Ltd Policy

30.0. Accident Reporting Chain



Ref No:	PL18	Originator:	John Bradshaw
Section:	4 - H&S & Safeguarding	ISO Ref:	4.2.3.4
Date:	24/08/2018	Approved:	J McInerney
Revision:	1.0	Page:	1 Of 5