



BIG CREATIVE
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BIG CREATIVE TRAINING
UPLANDS HOUSE
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BCT Health and Safety Policy

1.0 Scope

1.1 The aim of the policy is to ensure systems are in place to identify and reasonably control significant hazards across the business and all its undertakings. Ultimately the purpose is to safeguard the health, safety and welfare of employees, learners, visitors, and contractors. The policy will be prepared and written in compliance with:

- Health and Safety at Work etc. Act 1974.
- Regulations made under this Act, including the Management of Health and Safety at Work Regulations 1999.
- Approved Codes of Practice and Guidance issued by the Health and Safety Executive to support compliance with the above legislation.

'Big Creative Training (BCT) will at all times promote the policy as part of the companies values and ideals, and ensure that all those to whom the policy applies, including employees, learners, customers, stakeholders are consulted to the degree necessary to formulate and maintain it, as well as ensuring they also support and promote its values.

2.0 Health and Safety Policy Statement

BCT recognises that it has a responsibility to ensure that all reasonable precautions are taken to provide and maintain working conditions which are safe, healthy and comply with all statutory requirements, and if applicable, contractual duties of care, recognising our responsibilities under the Health & Safety at Work etc Act 1974, Management of Health & Safety at Work Regulations 1999 (as amended) and the Corporate Manslaughter & Corporate Homicide Act 2007.

We will, so far as reasonably practicable through the Managing Director and all persons designated with responsibilities, pay attention to:

- The assessment of hazards and risks relating to the health & safety of its staff, learners, and visitors to any of its premises
- The provision and maintenance of equipment and the implementation of safe systems of work
- Arrangements for ensuring safety, to include the use, handling, storage and transport of articles and substances
- The provision of instruction, training, and supervision to ensure the health & safety at work of employees, learners, and others
- The maintenance of the workplace to ensure it is in a safe condition and suitable for all work activities
- The provision of a safe means of access to and egress from the place of work
- The provision of adequate facilities and arrangements for welfare at work, including a commitment to the duty of care to learners and their safeguarding.

Big Creative Training is committed to ensuring its policies, procedures, organisation, and arrangements underpin the requirements of legislation, regulations, and contractual undertakings where applicable ensuring that employees and learners are aware of their entitlement to work and learn in a safe, healthy, and supportive environment. At the same time, communication of the policy as is the legal



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requirement, will ensure that a suitable and sufficient level of commitment to it is gained from all that the policy applies to and covers.

No health & safety policy is likely to be successful unless it involves its employees and gains their commitment to their own health, safety, and well-being as well as those they are responsible for within the workplace and related work environments. Every employee is therefore required to take reasonable care for his or her own health, safety, and welfare and that of others who may be at risk by their acts or omissions. The appropriate reporting of hazards, risks, and unsafe working conditions, wherever our responsibilities extend, is the duty of everyone associated with the business.

The policy will be reviewed at least annually and/or when operating conditions or underpinning guidance changes.

A copy of this statement is located electronically for the attention of all employees as well as displayed at all appropriate locations.

3.0 Health and Safety Responsibilities - Specific duties of key people and groups.

Managing Director

- Leading and directing H&S across all business undertakings.
- Ownership of Corporate Risk Assessments (CRA), company health and safety policy and the Health and Safety Management System (HSMS)
- Delegating and agreeing responsibilities and support ensuring that there is a commitment to access to competent advice and support for health and safety.
- Developing appropriate levels of competence and responsibility for health and safety across key groups and individuals.
- Allocating resources including human and financial.
- Determining and planning for competence.
- Creating and measuring a safety culture across the business

Directors / Senior Management Team

- Acceptance, understanding and disseminating BCT health and safety policy.
- Promoting an effective safety culture.
- Periodic and measurable liaising at all levels re health and safety.
- Appoint a competent person or persons to lead on investigations regarding accidents.
- Ensure that responsibility for health and safety to all parts of the business is disseminated and appropriate people are aware of these responsibilities.
- Ensuring that assessments of risk, supporting arrangements and procedures are disseminated throughout all work areas under their direct control.
- Support the annual audit of the business in addition to any periodical internal and external reviews/audits.
- Ensure that the HSMS is maintained by recognising changes required and directing updates as appropriate.



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Key/Departmental Managers.

- Promoting an effective health and safety culture.
- Co-operation and communication with directors on all matters of health and safety.
- Arranging for the assessment of risks within the limits of training and responsibility.
- Ensure all work areas under their control are safe and maintained in line with all statutory, regulatory, and best practice requirements.
- Ensure accidents are reported and recorded, reported in good time and in line with regulatory requirements and written company procedures.
- Ensuring effective liaison with all parties regarding learner safety across all schemes, both on and off-site regarding health, safety, and welfare.

Education, Learning and Innovation

- Promoting an effective health and safety culture.
- Co-operation and communication with all parties involved in procurement and delivery of training in respect of health and safety.
- Arranging for the assessment of risks within the limits of training and responsibility
- Ensure all work areas under their control, particularly those appropriate to learner safety, are safe and maintained in lines with all statutory, regulatory, best practice and contractual requirements.
- Ensure accidents are reported and recorded, reported in good time and in line with regulatory requirements and written company procedures.
- Ensuring effective liaison with all parties regarding learner safety across all schemes, both on and off-site regarding health, safety, and welfare.

General Duties of all Employees.

All employees have a responsibility to work within the legal requirements applicable to them as set out in BCT policy and supporting procedures and arrangements.

No employee is expected to work in such a way that puts themselves or others in a position where their health safety and welfare is compromised.

Supporting procedures and arrangements are provided to assist all employees to work effectively and safely and should be communicated through their teams allowing for understanding and acceptance. Any situation that arises where the procedures and arrangements cannot be complied with must be reported to your manager.

Certain duties are determined as applicable and key to certain groups and individuals beyond and above others. Additionally, there may be the need to define additional responsibilities for individuals and groups to assist BCT to discharge its duties and obligations.

4.0 Consultation with, and Commitment to Employees.

As determined by our legal and regulatory obligations, **Big Creative Training** will always communicate and cooperate and where necessary with all those affected by



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the health and safety policy and the activities determined within it. Where it is necessary to establish additional links with representative groups this will be undertaken as part of a formal consultation process. We will ensure a commitment to the competence and understanding of employees and learners, ensuring that training includes the importance of implementing the health and safety policy, the commitment necessary to it and the importance of promoting awareness of it.

5.0 Arrangements and Procedures.

Big Creative Training will develop arrangements and procedures for implementing its health and safety management system as well as those that specifically deal with the identification of hazards in the workplace and their elimination and/or control. Specific **procedures** for the control and implementation of the policy along with specific areas of risk, are outlined in **Appendix 1**.

Arrangements that cover day to day health and safety functions are listed in **Appendix 2** and are not included in the core policy. These will be managed by individual departments as appropriate and covered by a general system index. Arrangements as listed, are not comprehensive and it is probable that BCT will routinely undertake activities that are not covered by them. If this is the case, then BCT should develop procedures and / or guidance concerning these activities / hazards.

6.0 Health and Safety Management System

In order to achieve an effective health and safety management system BCT will adopt the '**Plan, Do, Check, Act**' approach achieving a balance between the implementation of health and safety systems with both the behavioural aspects of sound operational management across the business and a quality assurance approach. It also requires health and safety management to be considered as an integral part of good management generally, rather than as a stand-alone system. The components of the system are:

- **Plan** - establish the objectives and processes necessary to deliver results in accordance with the organisation's occupational health and safety policy
- **Do** - implement the processes
- **Check** - monitor and measure processes against occupational health and safety policy, objectives, targets, legal and other requirements, and report the results
- **Act** - take actions to continually improve performance of the occupational health and safety management system.

The health and safety management system is driven by the core policy and supported by procedures A and B in appendix 1, and in turn by the strength and accuracy of the arrangements in appendix 2.

7.0 Acceptance by Managing Director, managers, and employees

7.1 The Managing Director will sign the policy document to the effect that they have read and accept the Health and Safety Policy (including the statement of general policy) and the arrangements made to implement it. The general statement will also



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be signed and communicated across the business in any format to all those affected by it and responsible for its implementation and success.

7.2 Managers and designated staff members involved in the implementation of BCT's health and safety policy are required to acknowledge that they have received, read, and understood its contents. Employees also will be required to acknowledge that they have received, read, and understood the policy as it affects them and their health, safety, and well-being.

Signed by the Managing Director to indicate their acceptance of the Health and Safety Policy and the arrangements made to implement it

Name	Alexis Michaelides
Signature	
Date	1 st August 2023

Date Updated	To Review	Responsibility
July 2025	Jul 2027	AM



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Appendix 1. Health and safety Procedures

A - Health and Safety Policy – Development and Management.

Regarding the requirement under ***The Health and Safety at Work etc. Act 1974 S2.1 (1)*** we recognise the duty and responsibility to have a ***Health and Safety Policy General Statement*** that forms the basis of an integrated health and safety management system. The policy is reviewed annually in line with the legal requirements, and all supporting systems are reviewed annually as well as monitored periodically. Amendments as determined by changes in legislation and regulation will be taken into consideration as they arise. The core policy and health and safety management system are underpinned by statements covering the areas of core responsibilities and operating areas giving direction to those who manage and implement the overall system and its intentions. Along with our ***Corporate Risk assessment*** and the ***Health and Safety Management System – Operation and Administration Procedure*** we allocate responsibilities to ensure that the ownership and direction are matched by the application and execution of our responsibilities. These in turn are reviewed and audited as appropriate with reports being made available internally and externally where applicable and evaluated prior to review and re-signing of the policy general statement at executive board level.

Responsibility: Managing Director

B - Health and Safety Management System – Operation and Administration.

The ***Health and Safety Policy General Statement*** gives effect to an underpinning ***Health and Safety Management System***. The system demonstrates our commitment to ensure that all our legal and regulatory obligations are met through ownership, application, communication, and continual review and updating as and when appropriate. The system is reviewed annually and if appropriate and required, reports are produced for external contracting authorities as well as internally for the purposes of the executive directors and the board.



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The policy is signed by the Managing Director, who does so on satisfaction that operating policies, audits and reviews and corporate risk assessments are up to date and fit for purpose. With overall responsibility for health and safety he will assure himself of these requirements through a satisfactory review and if necessary, an audit of all the components of the health and safety management system including the activities of other directors, key managers and their teams as well as appointed staff with specific responsibility for health and safety and / or elements of the system.

The 'day to day' operating elements of the health and safety management system will be monitored as part of the general health and safety requirement for the business and as outlined by specific procedures and arrangements. This will be achieved through the duties and responsibilities assigned in the policy.

Where the reviews of health and safety are undertaken, and they inform changes to procedures and arrangements, these will be communicated throughout the business to all affected and the policy updated as and when appropriate.

Responsibility: Managing Director

C - Appraisal and Monitoring.

BCT recognises that it has a duty of care as defined in particular under **S3.1** of the **Health and Safety at Work Act etc.1974** to those who are not in our employment but are affected by our activities, acts and omissions. This responsibility extends to those on our premises or those on the premises of employers/partners who are supported by our training and assessment activities. We also recognise that we have a duty to protect our employees whilst discharging their duties when on the sites of employers and that an effective appraisal contributes to this process of hazard identification and risk reduction. Where we enter contractual obligations with external partners, we recognise that this should in no way compromise our legal duty of care but rather, and where appropriate, give direction to it if necessary.

Our approach regarding appraisal and monitoring is to ensure that learning and assessment of all learners, irrespective of their status (employed or non-employed) takes place in a safe environment. We recognise that the final and definitive responsibility for the workplace of any learner lies with the employer. We do however recognise that where we choose to discharge our duty of care through the initial appraisal and progressive monitoring of workplaces and learners, we have a responsibility to ensure our systems are fit for purpose. To discharge this duty our approach includes a commitment to:

- Review our system annually and monitor its effectiveness through



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regular quality checks.

- Train and inform employees tasked with appraisal and monitoring duties to ensure their competence.
- Develop learning agreements with employers that determine responsibilities of all parties.
- Inform and instruct learners as to their responsibilities and the requirements to operate within the procedures and systems appropriate to their schemes and to their employer.
- Where premises are under our direct control, we will maintain the facilities and provide the environment appropriate to the learner and the programme.
- Ensure that the safeguarding of the learner represents the requirements of UK legislation as well as contractual obligations and that all parties are involved in discharging the duty.

Responsibility:

BCT Facilities – Facilities Manager

Staff and student H&S inductions – Facilities Manager

Apprentices & Trainees – Employer Engagement Manager

Work Experience – Work Experience Manager

Trips and Events – Deputy Director of Study Programmes

D - Assessment of risk – Procedure for the reduction and control of risks under our control.

BCT's health and safety policy aim are to protect the safety, health and welfare of all employees, learners / participants, and anyone else who may be affected by its activities. The process of risk assessment is a key element of ensuring all effective control measures are in place and where necessary additional control measures are identified and implemented to assist the achievement of this. The process of risk assessment will commence with a **Corporate Risk Assessment** of health and safety linked and integrated into the overarching corporate risk approach for the business. This in turn will give effect to general and specific risk assessments based around activities and processes where identified and necessary under legislation and regulation.

Risk assessments will be undertaken annually and reviewed where necessary and include:

- all areas of operation under the companies' control.
- where there are significant changes to operational procedures and arrangements
- changes to legislation, regulation and / or guidance which impact on BCT
- if accidents, incidents, and dangerous occurrences occur
- specific areas i.e. young people, vulnerable adults, people with



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disabilities, expectant/new mothers, fire, COSHH, first aid, driving etc.

BCT will ensure that all personnel carrying out risk assessments are suitably competent to do so and/or or appoint competent people to assist. Where significant hazards and /or personnel at risk are identified suitable and sufficient controls will be put in place and monitored for their effectiveness and ability to reduce or remove hazards and control risks. At all points of the risk assessment process, those affected will be informed of any significant findings. Copies of risk assessments and /or significant findings will be made available to those affected by them. BCT will ensure that risk assessments are kept operational by regular reviews of all activities, investigation of accidents, incidents and absences and inspection of the workplace with procedures in place for the reporting and reduction of hazards.

Responsibilities

Corporate Risk Assessment - Managing Director

Site Risk Assessment – Facilities Manager

Staff / DSE Risk Assessment – Facilities Manager

Trips and Events Risk Assessments – Deputy Director of Study Programmes

E - Competence and responsibilities - Procedure for operational support and effectiveness of health and safety management.

The specific responsibilities of key groups and individuals re health and safety is essential to underpin the overarching ***Health and Safety Policy*** as well as the effective and efficient administration of the ***Health and Safety Management System***. The policy of BCT is to ensure that key groups and / or individuals understand their responsibilities and undertake them in the common aim of delivering the policy and its supporting policies, arrangements, and procedures.

Responsibility: Facilities Manager

F - Accident recording reporting and investigation.

We recognise under our health and safety policy and supporting arrangements and procedures the responsibility to report, record and investigate accidents. Where accidents, incidents and ill-health events occur then we will investigate all under our responsibilities under the ***Reporting of Injuries, Diseases and Dangerous Occurrence Regulations 2013 (RIDDOR)***. We also recognise our responsibility to co-operate with 3rd parties



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particularly funding agencies, where staff and learners may have accidents whilst working and operating on the sites of clients. Specifically, our responsibilities will extend to:

Immediate notification by all employees of an accident, incident, or work-related health issue to the responsible person in BCT or designated site contact. Recording by responsible people of all necessary details applicable to the event. Investigation of the circumstances of the event and further recording of appropriate information. Reporting to investigating authorities if required under RIDDOR 2013. Amendment to any procedures and arrangements because of investigation.

Where accidents etc. happen on the premises of clients it will be the responsibility of the site to complete its own documentation and procedures.

All employees and BCT as a business will always co-operate with 3rd parties and / or enforcing authorities where required to in respect of specified accidents and incidents. The results of any investigations will be utilised to amend risk assessments and method statements as well as information, instruction, and training as and when appropriate.

Responsibility: Facilities Manager

G – Procedure for safety regarding Fire and Emergencies

BCT believes that ensuring the health and safety of staff, visitors and all relevant persons is essential regarding operating requirements as directed through the Fire Reform order. We are committed to preventing accidents and ill health because of any fire related incident. We will always comply with statutory requirements as a minimum and assess and control the hazards and risks associated with fire that arise from our work activities.

We will provide a safe and healthy working and learning environment and provide effective information, instruction, and training in support of our fire arrangements. Consultation with employees on health and safety matters is essential as well as monitoring and reviewing our operating systems and prevention measures in respect of fire safety to ensure its effectiveness. We will ensure adequate resources are made available for fire safety issues, so far as is reasonably practicable. A Fire Safety Management System will be created to ensure the above commitments can be met. Employees throughout the business and at all locations must play their part in the creation of a safe and healthy working environment for all.

Responsibility: Facilities Manager



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H - Safeguarding.

BCT is committed to promoting and safeguarding the welfare of learners, children, and adults at risk. We will at all times adopt a policy of raising the awareness of the importance of safeguarding and ensure that we provide opportunity and resources at all levels, but led through senior management, for all those within our consideration and affected by our undertakings have the opportunity and process to raise concerns. BCT will ensure that all procedures and arrangements are communicated and displayed, and that where appropriate training and instruction supports these activities. We will always attempt to identify the potential for risk through all our operational procedures and ensure that the appropriate controls are in place at each point of assessment and / or disclosure.

Responsibility: Director of Operations (Ben Jolly)

I - Lone Working Policy.

BCT recognises that the risk from lone working is a tangible one and as such will ensure that all formal risk assessments make adequate reference to the hazards associated as well as the required controls. At all points we will identify those likely to be classed as lone workers and as such instruct management at all levels to assure those affected of the necessary procedures and control for their protection and wellbeing. This will as far as be reasonable to do so define employees as 'field based' and will relate where possible in risk assessments and related procedures. Procedures and controls will consider the relationship with related policies and procedures / arrangements including, but not restricted to work related driving. Supporting arrangements as outlined will be reviewed regularly in line with overarching policies to make sure that controls are effective, and our employees are safe. This will include procedures for reporting and investigation of accidents and incidents in the workplace, wherever that may be during the employee's duties. Employees will also be tasked with reporting to their line managers any deviation from policies procedures and arrangements where their health and safety may be affected.

**Apprentices & Trainees – Employer Engagement Manager
Work Experience – Work Experience Manager**

J - Work related driving.

Driving whilst undertaking work on behalf of BCT is acknowledged to be an essential part of our business operation and one of the highest risks that



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employees can face. We therefore take the arrangements and procedures for risk assessment very seriously and expect all employees to undertake the activity responsibly. In support of the policy we will undertake an assessment of risks both generally and specifically and communicate all requirements through the appropriate procedures and arrangements.

Responsibility: Facilities Manager

K - New and Expectant Mothers.

Pregnant workers, workers who have recently given birth or who are breastfeeding, are considered a specific risk group in many respects and measures must be taken regarding their safety and health. We have a statutory obligations under the ***Management of Health and Safety at Work Regulations*** to ensure any workplace hazards are risk assessed for new and expectant mothers and that these risks are removed or reduced so far as is reasonably practicable. We are committed to ensuring that new and expectant mothers are not exposed to any significant risk. Risks include those to the unborn child or child of a mother, who is breastfeeding, not just risks to the mother herself. We are committed to ensuring their safety while at work by providing a safe working environment which, as far as is reasonably practicable, reduces the personal risks to the new, or expectant mother and her unborn child, implementing a proactive approach to risk assessment to identify where risks need to be controlled and providing guidance to management and staff on implementing adequate control measures.

Responsibility: Facilities Manager

L - Work Related Stress

BCT will identify all workplace stressors and assess risk to eliminate stress or control the risks from stress. If undertaken, a 'work related stress risk assessment' will be regularly reviewed. We will consult where necessary on proposed actions relating to the prevention of workplace stress. When necessary, we will provide training to reinforce good management practices. Confidential counselling for staff affected by stress caused by either work or external factors will be offered and supported by adequate resources to enable managers to implement BCT's agreed stress management strategy.

Responsibility: Director of Operations