



GENERAL HEALTH & SAFETY POLICY

Employee Safety Handbook 2026-2027

Policy:	General Health & Safety
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1. Introduction

This document details Breakthrough Transformation Trusts (BTT) commitment to effective and successful health and safety management. It contains a statement of intent, and provides key information about Breakthrough's Health and Safety Policies, procedures and other arrangements. It also includes information about your duties as an employee and will help you to understand Health and Safety issues which affect you at work.

This policy has been approved by the CEO and is subject to a review no more than every 12 months.

The aim of all the Health and Safety policies is to create a working environment where everyone within the BTT community can undertake their roles and responsibilities, fulfil their potential, and go home at the end of each day free from work-related injury or ill health.

2. Health and Safety General Policy Statement

The Board of Trustees of Breakthrough Transformation Trust (BTT) is the legal employer and the ultimate duty holder under Section 2 of the Health and Safety at Work etc. Act 1974. The Board retains overall responsibility for ensuring, so far as is reasonably practicable, the health, safety and welfare of staff, students, volunteers, visitors, contractors and any other persons who may be affected by its activities.

The Board discharges its strategic responsibilities by ensuring that the Executive Leadership Team is appropriately resourced, competent and accountable for the implementation of this policy and associated arrangements.

BTT will assess workplace hazards and risks and take reasonably practicable measures to eliminate or reduce those risks. Health and safety will be integrated into all operational, educational and support activities.

BTT will:

- Ensure its buildings, grounds, equipment and working environments are maintained to appropriate health and safety standards.
- Provide suitable information, instruction, training and supervision to enable staff to work safely.
- Develop and communicate safe systems of work and sensible risk management arrangements.
- Promote a culture in which staff and students take reasonable care of their own health and safety and that of others.
- Monitor performance, investigate incidents, review findings and continually improve health and safety arrangements.
- Ensure health and safety responsibilities are incorporated into management arrangements and relevant contractual agreements.
- Review risk assessments, procedures and policies regularly and following significant change, incident or new information.

BTT recognises its duty to cooperate with other employers, contractors and partner organisations to ensure health and safety is maintained wherever activities are undertaken.

All staff are expected to understand and comply with this policy and their individual health and safety responsibilities.

3. Responsibilities

This section provides a brief summary of the Health and Safety management responsibilities within Breakthrough Transformation Trust. Specific responsibilities are set out and explained within every Health and Safety Policy and staff are expected to familiarise themselves with any that are applicable to them.

3.1 Chief Executive Officer (CEO)

The Chief Executive Officer (CEO) is responsible for the overall arrangements and for ensuring that the company's operations are executed at all times in such a manner as to ensure, so far as is reasonably practicable, the health, safety and welfare of all employees and others who may be affected by its operations.

In particular the CEO will:

- a) Ensure there is an effective company policy for health and safety and that all employees, contractors and temporary workers are made aware of their individual responsibility.
- b) To understand and ensure, through the appointment of competent persons, that the company's responsibilities as employers under the Health and Safety at Work etc. Act 1974 and any relevant Acts of Parliament and Statutory Instruments are met.
- c) To designate a senior leader with responsibility for health and safety management and oversight.
- d) To ensure that all Directors and Managers understand and fulfil their responsibilities with regard to health and safety.
- e) Arrange for funds and facilities to meet the requirements of company policy and legislation.
- f) Make provision for adequate and appropriate training to be given to all employees.
- g) To ensure that notification and reporting procedures to the relevant statutory authorities are carried out.
- h) Set a personal example on all matters of health and safety.

3.2 Chief Operating Officer (COO)

The COO is the Director Responsible for Health and Safety and is accountable to the CEO for all matters relating to health, safety and welfare of employees and those affected by the companies operations.

3.2.1 In particular the COO will:

- a) Understand and ensure that the implications and duties imposed by new Acts of Parliament, Statutory Instruments, H.S.E. Guidance Notes and Codes of Practice are brought to the attention of the Board of Trustees.
- b) To report significant health and safety matters, trends, compliance issues and incidents to the Executive Leadership Team and Board of Trustees through established governance arrangements.
- c) To ensure that good communications exist between employer and employees and are maintained, on matters relating to health and safety.
- d) Carry out inspections, audits, report recommendations, changes in legislation and advice obtained from other sources.
- e) Report and investigate all R.I.D.D.O.R. reportable incidents.
- f) Ensure adequate means of distributing and communicating health, safety and welfare information obtained for the H.S.E., Safety organisations and Trade associations regarding new techniques of accident prevention, new legislation requirements and codes of practice etc.
- g) Ensure that an adequate programme of training for health and safety is established and that the safety culture is encouraged amongst employees.
- h) Set a personal example at all times by using the correct personal protective clothing/equipment and following all safety requirements and procedures.
- i) Compile and present a formal health and safety performance report—including accident metrics, statutory notices, and compliance audit registers—to the Board of Trustees on an annual basis, while maintaining a direct escalation pathway for immediate reporting of critical or RIDDOR-reportable incidents.

3.3 Managers/Line Managers

- 3.3.1 Each Manager/line manager is responsible for their personal safety and that of all personnel under their authority, including others who may be affected by the company's activities.
- 3.3.2 In particular they will:
 - a) Understand and implement the company Health and safety policies.

- b) Appreciate the responsibilities of personnel under their authority and ensure that each employee knows his/her responsibility and are equipped to play their part.
- c) Conduct Risk Assessments on activities within their department ensuring that the methods and systems of work are safe. Also, that the necessary procedures, rules and regulations designed to achieve this are formulated, published and applied.
- d) Provide written instructions of work methods outlining potential hazards and precautions, and ensure they are complied with.
- e) Ensure accident and near-miss reporting procedures are understood and complied with and assist with accident investigations where appropriate.
- f) Ensure all employees and sub-contractors are suitably trained/competent to carry out the prescribed task and that the necessary licenses/certificates of competence are in force and appropriate.
- g) Ensure the Statutory Notices, the Safety Policy, Insurance Certificate and the names of Appointed First Aiders are displayed and maintained in prominent locations.
- h) Ensure that all new employees in the company are provided with a copy of the Health and Safety Handbook, that they receive such induction training as may be laid down in procedures, that they are issued with personal protective equipment as required and that their personal responsibilities are set out to them as explained in policies and procedures.
- i) Address failures to comply with health and safety requirements in accordance with Trust policies and procedures, including the disciplinary procedure where appropriate.
- j) Set a personal example with regard to health and safety matters.

3.4 All Employees

- 3.4.1 Under section 7 of the Health and Safety at Work etc. Act 1974, all employees have a legal duty to take reasonable care for the health and safety of themselves and others who may be affected by their acts or omissions at work, and also to co-operate with management on all aspects of Health and Safety.
- 3.4.2 You must co-operate with and follow all emergency arrangements, policies, procedures, and other Health and Safety documents put in place by Breakthrough.
- 3.4.3 You must ensure that you report all accidents, near misses or damage to equipment and property as soon as possible to your line manager or other responsible person.

- 3.4.4 You must co-operate and assist with accident or incident investigations when asked.
- 3.4.5 You must refrain from deliberate acts or interference with anything provided in the interests of health, safety and welfare. This includes alteration, removal or deliberate disablement of guards and other safety devices and unauthorised alteration or repair of equipment.
- 3.4.6 You must carry out your tasks in a safe manner and follow any instructions, procedures or Safe Systems of Work given to you by managers and supervisors. If you identify a hazard or hazardous situation that you are not able to put right, you must immediately, or as soon as possible, report it to the person managing the work.
- 3.4.7 You have a duty to ensure that all personal protective equipment provided for you is worn as directed, kept clean, maintained and stored in the correct manner.
- 3.4.8 Remember that sections 3.5.1 to 3.6.3 are statutory duties. The Enforcing Authorities may prosecute individual employees who fail to comply.
- 3.4.9 Neglect of Health and Safety regulations or responsibilities will be regarded as a disciplinary matter.

3.5 Students

- 3.5.1 All students are expected to:
 - a) Take reasonable care for their own health and safety at BTT, and that of their peers, teachers, support staff and any other person that may be at the Centre.
 - b) Cooperate with staff and follow all health and safety instructions given to them.
 - c) Not intentionally or recklessly interfere with or misuse anything provided in the interests of health, safety and welfare.
 - d) Report to a member of staff any health and safety concerns that they may have.

3.6 Contractors and Visitors

- 3.6.1 All contractors and visitors working on BTT premises must comply with relevant health and safety requirements and emergency procedures.
- 3.6.2 Contractors must identify and control risks arising from their activities and must inform the Head of Centre or nominated contact of any hazards that may affect staff, students, visitors or other contractors.

- 3.6.3 Contractors will receive relevant site information and emergency arrangements before commencing work, and records of contractor management will be maintained in accordance with Trust procedures.
- 3.6.4 Where unsafe conditions arise and are not adequately controlled, BTT reserves the right to stop work until suitable control measures have been implemented.

4. HSE Health and Safety Law Poster

The Health and Safety Information for Employers Regulations 1989, requires employers to either display the HSE-approved law poster or to provide each of their workers with the equivalent leaflet. BTT shall adhere to this statutory requirement by having a minimum of one HSE-approved law poster at each of its properties. The location of this will be made clear during initial induction, and will usually be located in a staff or rest area (I.e. staff room, reception etc.).

5. Welfare and other facilities

5.1 BTT will ensure that each of its properties has:

- A suitable and sufficient number of toilets
- Hand-washing and drying facilities
- Drinking water
- Somewhere to store personal belongings and clothing
- Somewhere to rest
- Somewhere to eat
- Suitable and sufficient First aid coverage and provision

5.2 BTT will also, so far as is reasonably practicable, ensure that its working areas have:

- Good ventilation and clean air
- A reasonable working temperature
- Suitable lighting
- Enough space
- Suitable workstations and seats
- A clean workplace
- Properly maintained work premises and equipment
- Unobstructed floors and traffic routes
- Safety materials or protective coating

- Smoking and vaping must only take place in designated areas identified by the Trust. Staff, visitors and contractors must comply with site-specific arrangements. Smoking and vaping are prohibited in all buildings, vehicles and any location where they may adversely affect others.

6. Training, Information and Competency

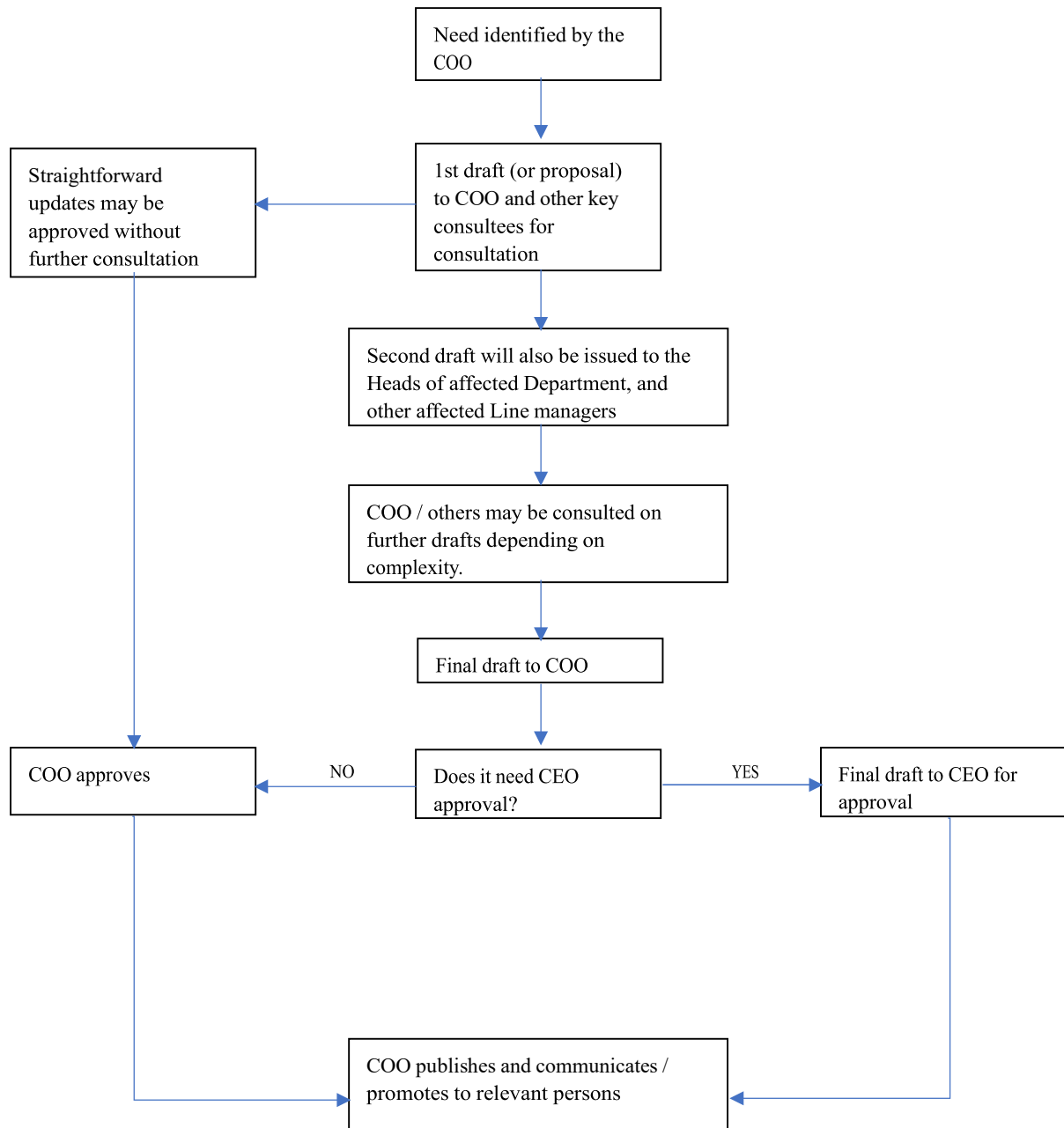
- 6.1 Competence of individuals is vital, whether they are employers, managers, supervisors, employees or contractors. It ensures they recognise the risks in their activities and can apply the right measures to control and manage those risks.
- 6.2 All staff should have the ability to undertake responsibilities and perform activities to a recognised standard at all times.
- 6.3 BTT must give all its employees, contractors and self-employed workers adequate instructions, information, and training about:
- Relevant hazards and risks
 - The measures in place to deal with those hazards, and  Any emergency procedures
- 6.4 To the best of its ability, BTT will ensure that:
- Key responsible people/job holders are identified and there are clearly established roles and responsibilities
 - People have the necessary training, skills, knowledge and experience to fulfil their responsibilities and are given enough time to do so
 - It provides necessary training and information free of charge to its staff, that will enable them to fulfil their roles and responsibilities competently and safely
 - Wherever possible, necessary training takes place during normal working hours and employees are not charged.
 - Lessons are learned and good practice are shared internally (and externally where appropriate)
 - BTT will ensure that training, information and instructions are accessible and understood by all workers. Where required, reasonable adjustments, additional support, translated materials, or alternative methods of communication will be provided to enable individuals to work safely and fulfil their responsibilities effectively.
 - BTT recognises that some workers, including those who are new to the workplace, role, or industry, may require additional training, guidance, or supervision to develop competence and work safely. Support will be provided according to individual needs and risk assessments.

7. Consultation

7.1.1 The Consultation Process table below details the consultation process that will take place on new health and safety policies and standards that apply across BTT. The purpose is to ensure:

- a) compliance with legal requirement to consult staff or their representatives on matters that affect their health and safety
- b) that those affected have the opportunity to input into its development, thereby helping to ensure suitable, practical standards are produced

7.2 Health and Safety Consultation Process



- 7.2.1 Normally, the COO will lead the development of company health and safety standards to meet legal requirements for health, safety, occupational health and fire safety. Some occupational health related standards may also be led by the Director responsible for HR in consultation with the COO.
- 7.2.2 The first draft of new or significantly revised standards should be accompanied by a brief outline for the reasons why the standard or proposed changes are needed.
- 7.2.3 Straightforward standards and revisions will be consulted on via consultation groups of key people identified as having a particular interest in the subject, either by email or meeting.
- 7.2.4 Standards and policies or revisions to standards and policies that will significantly impact on current practice must be approved by the COO, and CEO if necessary.
- 7.2.5 In some cases, it may be necessary to produce a standard at short notice, to respond to a particular issue. In such cases, consultation periods and the extent of those included in consultation may be reduced. However, information regarding the new or changed standard will be shared with affected people immediately following its publication.
- 7.2.6 Generally, consultees will be given between Two and Four weeks to consult on each draft, unless there is a good reason why a shorter timescale is justified.
- 7.2.7 Although the Head of Centre may be copied into consultations, it is the COO's role to identify key consultees and communicate and co-ordinate consultations within their Centre.

7.3 Staff Consultation

- 7.3.1 All staff are given the opportunity to consult on existing health and safety standards, policies and other matters. They can do this by consulting their Health and Safety representative, Line Manager, other senior manager, or by contacting the COO directly at any reasonable time.
- 7.3.2 All concerns shall be taken seriously and should be recorded and shared with the responsible person(s) as per the Health and Safety Policy, at the soonest opportunity.
- 7.3.3 Staff may be asked to participate in a Health and Safety Consultation Survey every year that will allow them the opportunity to comment on health and safety matters relating specifically to their role and place of work. This will be



reviewed by the Health and Safety Lead (COO) and all concerns will be taken into account, and necessary actions taken.

7.4 Health and Safety Representative Consultation

The COO will consult with the Health and Safety Representative in each Centre at least termly. Records of discussions, concerns and resulting actions will be retained within the Trust's health and safety monitoring systems and/or SharePoint quality assurance records.

7.5 Student Consultation

- 7.5.1 All student concerns shall be taken seriously and should be recorded and shared with the responsible person(s) as per the Health and Safety Policy, at the soonest opportunity.

8. Breaches of Policy and Disciplinary

- 8.1 Any breach of health & safety legislation, Trust policy or safe working practices will be investigated proportionately. Where breaches are substantiated, appropriate action will be taken in accordance with trust policies and procedures, including the disciplinary procedure where necessary.
- 8.2 In cases of minor employee breach of contract, where this has had little or no adverse impact on the business or other members of staff/service user, the employer may want to address this informally, for example, by way of a one-to-one chat and, where necessary, a verbal warning. For more serious breaches, it may be appropriate to initiate formal disciplinary proceedings, in some cases with a view to dismissal, depending on the outcome of the investigation and severity of the matter.
- 8.3 Disciplinary proceedings will be carried out in line with the Disciplinary Policy.

9. Health and Safety Policies

00	General H&S Policy (Employee Safety Handbook)	
01	Risk Assessments	
02	Personal Protective Equipment (PPE)	
03	Fire	
04	Alarm and CCTV	
05	First Aid	
06	Lone Working	
07	Positive Mental Health & Wellbeing	
08	Pets	
09	Food and Kitchens	
10	Workshops, Labs & Work Equipment	
11	Off-site Activities	
12	Managing Contractors and Projects	
13	Working at Height	
14	Manual Handling	
15	Vehicles and Car Parks	
16	Accident, Incident & Near Miss Reporting	
17	Buildings, Grounds and Woodland	
18	Managing Violence & Aggression in the Workplace	
19	Electrical Safety	
20	Hygiene	
21	COSHH (Control of Substances Hazardous to Health)	
22	Managing Allergies and Medical Conditions	
23	Medication	
24	Emergency Asthma Medication	
25	Emergency AAI's (Auto Adrenaline Injectors)	
26	AED's (Automatic External Defibrillator)	
27	Legionella Management	
28	Asbestos Management	
29	Display Screen Equipment (DSE)	
30	Ready for Anything	
31	Carbon Neutral	

Key Points from Policies

The following section will provide you with the key points from each of BTT's Health and Safety Policies.

01 Risk Assessments

The Line Manager is usually responsible for ensuring necessary and sufficient risk assessments are in place for all activities that require one within their department (area of responsibility).

The line manager may delegate competent staff to complete an activity risk assessment on their behalf. In this event, it should still be proof checked and approved by the Line Manager.

Due to the nature of BTT's day-to-day activities working with students with various difficulties, there are occasions when a written risk assessment isn't able to be completed before an activity due to a dysregulation or change in the students behaviour which requires immediate intervention.

Dynamic risk assessments are important for all staff to conduct throughout their day-to-day activities. To achieve an effective dynamic risk assessment, all staff must familiarise themselves with their students individual RA, as well as being familiar with the site that they are at. The initial induction will include a tour of the site which will help you to become familiar and identify areas of potential risk to your student in accordance with their RA.

02 PPE

There is a statutory requirement under the Personal Protective Equipment at Work Regulations 1992, for personal protective equipment (PPE) to be supplied and used at work wherever there are risks to Health and Safety that cannot be adequately controlled in other ways.

PPE must be considered in addition to all other control measures and should not be relied on as the only means of protection.

The Line Manager is responsible for ensuring appropriate PPE is provided, used and stored correctly. Breakthrough will provide all necessary and appropriate PPE free of charge.

All staff will:

- Co-operate with managers in any PPE selection process
- Wear/use the PPE correctly
- Carry out PPE maintenance and cleaning where necessary
- Store the PPE correctly

- Check all PPE for damage before use
- Report any defects or wear and tear
- Not misuse any PPE issued to them
- Inform managers if they suffer an adverse reaction or sensitivity when using PPE so that advice can be sought from Occupational Health and / or the staff member's GP. ☒ Report any reactions / incidents related to PPE

03 Fire

Fire Extinguishers must be quickly and easily accessible at all times. They must never be blocked, moved (unless using in an emergency) or used to hold doors open.

Fire Doors must be kept closed at all times, unless they can legally and safely be held open by an approved fire door retainer. They must never be wedged open, or otherwise blocked/held open.

Fire Evacuation drills will be conducted at least once every half-term. Everyone must take part in a Fire Evacuation drill.

In order to assist disabled or sensory-impaired people, as well as any others who may be unable to evacuate swiftly or independently in the event of a fire, they must have a Personal Emergency Evacuation Plan (PEEP) in place in order to support them. Relevant staff may undergo additional training in order to ensure safe evacuation of an individual in the event of an emergency.

Centre specific Procedures are located at various appropriate locations throughout each Centre. But another helpful analogy is to remember FIRE (in no particular order):

Find a fire?

Isolate it. If you are able to without putting yourself in too much danger, close all doors, windows, electrical/gas supply in order to isolate the fire.

Raise the alarm – Press a call point if one is available, or otherwise repeatedly shout FIRE and make everyone aware of the incident. Call 999, or get someone else to, at request for the fire Brigade.

Extinguish and/or Evacuate – Only if you are trained to do so and the fire is small enough to, attack the fire with appropriate equipment, however, fire fighting is always secondary to life safety.

If the fire is too large, you haven't received any training, or if you are uncertain in any way, it is safest to evacuate. Fire Wardens shall ensure a swift and full evacuation of the buildings.

04 Alarm and CCTV

BTT has CCTV systems installed at each of its student Centres. CCTV cameras are located at strategic points on site, principally at the entrance and exit point for the sites and various buildings. CCTV signs will be prominently placed at strategic points and at entrance and exit points of each site to inform staff, students, visitors and members of the public that a CCTV installation is in use, its purpose and details of the operator.

The use of a CCTV system is covered under the Data Protection Act 1998, the UK General Data

Protection Regulation (GDPR) and any subsequent data protection legislation, as well as to the Freedom of Information Act 2000, the Protection of Freedoms Act 2012 and the Human Rights Act 1998.

With regard to the information above, only named staff are permitted to manage and access the CCTV system. All requests for access to view/copy CCTV footage by individuals should be made in writing to Debbie Dugdall, CEO.

05 First Aid

A named First Aider will take charge when someone is injured or becomes unwell.

All accidents, injuries and incidents of work related ill health must be reported on the same day, or otherwise as soon as possible, following the incident.

BTT will ensure that there is sufficient first aid and PPE coverage across all areas of its business. It is usually the responsibility of the First Aiders to ensure that First Aid kits and PPE remain well stocked and that stock is kept in-date.

The Head of Centre or another designated member of staff will inform parents of any accident, illness or injury sustained by a student, and any first aid treatment given, on the same day, or as soon as reasonably practicable. This should be done by using the 'Notifying Parents of an Accident or Illness' form. More urgent matters shall be made by verbal communication over the phone, or in person.

06 Lone Working

Breakthrough Transformation Trust (BTT) defines a lone worker as anyone who works by themselves for any length of time without direct or close supervision from a trained and competent colleague. Within Breakthrough Transformation Trust (BTT), there are a few different ways that staff would be identified as a lone worker:

- When working alone off-site without a student (e.g. home visits, off-site meetings etc.),
- Working alone off-site with a student (e.g. off-site activities, student pick-up/drop-off etc.),
- Working alone on-site before, after or sometimes during normal working hours, as well as during the holidays (e.g. overtime, cleaning etc.)

- Home Workers and other remote or hybrid workers.

When working off-site outside of your normal workplace, an off-site working form must be completed, whether or not you are lone working.

Lone Working must be considered as part of the formal activity risk assessment, that covers all the hazards and risks that can be identified, and considered if there are any additional hazards to someone lone working.

07 Mental Health

Breakthrough is committed to promoting the positive mental health and well-being of both staff and students. We aim to promote this using both a universal whole-team approach to mental health by creating a safe and stable environment across all centres, and individual targeted approaches.

At Breakthrough, although the needs of the students have to come first, we greatly value every member of staff and are invested in their well-being. We recognise that staff's own mental health is important in order to hold a students' mental health safely. Creating an ethos and environment that supports wellbeing is central to the work at Breakthrough, and this should be evident within a supportive, encouraging, affirming staff team.

We encourage all staff to fully utilise their break from 2.30-3pm to move away from screens and take a break from work, using this time to benefit their well-being.

Breakthrough aspires to a working environment where there is no shame regarding disclosing mental health struggles. Staff should feel able to talk to their line manager if they feel their mental health is suffering. Breakthrough will listen to and give great consideration of any requests for reasonable adjustments at work on a case by case basis.

While it is important to show sensitivity, Breakthrough recognises that in certain cases it may be appropriate for line managers to intervene if they have concerns, as with any other aspect of performance.

Breakthrough's counselling service has been created to offer counselling to students. However, our counsellors are available to informally chat to after 3pm if you would like some support. Counsellors also provide staff process groups for staff to receive support if their work with students has affected them. If staff feel they would benefit from receiving counselling, Breakthrough provides access to DAS Depression and Anxiety free counselling service for staff and their immediate family members.

08 Pets

Other than dogs, BTT does not allow staff to bring their pets to work unless there is a clear educational or therapeutic goal for students in mind. In all circumstances, management must be consulted prior to pets being brought on site, and a risk assessment needs to be in place that covers the specific risks for the type of animal or pet being brought onto the site.

Dogs will not be considered for inclusion until they are at least 1 year old and adequately trained and vaccinated.

BTT needs to receive proof of the pets' insurance cover, which must include public liability.

Staff that bring their dog or other pet to the workplace must read and be familiar with the full, most recent and up-to-date Pets policy. Compliance is expected at all times.

Assistance dogs (and other qualifying animals) are used to assist people with a disability and are not considered as pets; they are treated as 'Auxiliary Aids'. In compliance with the Equality Act 2010, trained assistant dogs must be allowed access on-site (except in the most exceptional circumstances), although reasonable adjustments may need to be made to accommodate everyone's needs. Therapy or emotional support dogs are not assistance dogs and do not have the same legal privileges (please see the full pets policy).

Breakthrough does not routinely allow students to bring their pet(s) to the Centre. The only exception is if the animal is a trained or in training assistance dog, in which case it is considered as an Auxiliary Aid and must be allowed entry on-site.

09 Food and Kitchens

Any staff working with food must have a level 2 Food Safety and hygiene qualification. Staff and students who do not possess this qualification must be supervised by someone who has when working with food.

Staff, visitors or students must make any known food allergies or dietary requirements known to the Confidential secretary who will inform staff.

All staff, visitors and students must only eat in the designated or approved eating spaces as set out by the HoC in accordance with the risk assessment.

Food must not be consumed behind or at a shared/communal computer desk, for allergen and hygiene reasons.

10 Workshops, Tools and Machinery

For the purpose of this policy, the term 'workshops' are areas where machinery, equipment and/or tools are used, in an indoor or outdoor situation. 'Workshop' shall include mechanics bays and science Labs, as well as any other area used for fabrication, construction, maintenance or other workshop-type activities not in the boundaries of a defined workshop area (including IT, music, farm and art/craft rooms).

Workshops are areas of relatively high risk, so good suitable safety training is essential for everyone who works within them.

Only those authorised to do so by the appropriate manager may enter or work within workshops or stores, and must comply with the requirements of the manager and all safety systems whilst in that area.

Personal and non-BTT equipment is forbidden to be used on BTT premises, or by BTT staff during working hours at any other premises, without prior knowledge and consent from the COO. This is to ensure checks are made to ensure that equipment is compliant with PUWER (legal standards).

11 Off-site Activities

All off-site activities (including trips and visits) must be carefully planned, appropriately risk assessed, and well managed.

All off-site activities should have a particular learning or therapeutic outcome in mind.

Prior to any off-site activity, a student's individual risk assessment must be studied and appropriate actions taken. The students' demeanour on the day must be carefully assessed. This information must then be used in conjunction with the risk assessment.

The activity leader is required to conduct a risk assessment prior to any planned off-site activity. This must include plans for contact with BTT using direct contact through a mobile phone throughout the period. If necessary, other staff, managers or a member of the Health and Safety team should be consulted during this process.

As an absolute minimum, there must be a suitably stocked First Aid Kit to hand and someone must be appointed to deal with First Aid during your visit.

All Lone Working and off-site procedures must be followed before, during and after off-site activities, as laid out in the relevant policies. It is important that all staff are familiar with the Lone Working policy.

12 Managing Contractors and Projects

No matter the arrangement, BTT has certain health and safety responsibilities, for both the contractor and for anyone else who may be affected by their work. This policy is designed to highlight individual responsibilities whenever BTT hire, manage, or supervise contractors, as well as the responsibilities that contractors have to keep themselves and others safe. It also covers how to choose the right contractors and how to plan work/projects, what procedures must be in place, and how to make sure that everyone plays their part in maintaining a safe working environment.

13 Working at Height

Working at height is defined by HSE as any work in any place where, if precautions are not taken, a person could fall a distance liable to cause personal injury. Falls, together with slips and trips have always been the major incident category of concern nationally and account for more deaths and serious injuries than any other incident class.

So far as it is reasonably practicable to do so, Breakthrough Transformation Trust will avoid the need for its employees to undertake work at height operations at work which involve a risk of their being injured.

Only staff and contractors who have received training and are competent to undertake the task may work at height or use access equipment.

The Work at Height Regulations require that a risk assessment is completed for any work at height undertaken and that the findings are recorded as part of the planning process for the work.

The assessment should consider both the work to be done and the most appropriate access equipment to be used (not just what is available on site) to achieve a safe system of work.

14 Manual Handling

Manual Handling can be identified as meaning “any transporting or supporting of a load (including the lifting, putting down, pushing, pulling, carrying or moving thereof) by hand or bodily force”.

All staff shall undergo mandatory Manual Handling training annually. No member of staff or student should undertake a manual handling activity that presents a significant risk unless they have received appropriate instruction, training and support.

So far as it is reasonably practicable to do so, Breakthrough Transformation Trust will avoid the need for its employees to undertake manual handling operations at work which involve a risk of their being injured.

All manual Handling tasks that present a risk of injury to any staff or other individuals who may be effected (including students, visitors, contractors and the public) must be adequately risk assessed. For higher risk or specialist activities, a Safe System of Work should also be created. All suitable records must be kept

15 Vehicles and Carparks

You must hold a valid driver’s licence in order to drive for Breakthrough business. You must not drive if you have been disqualified.

BTT must hold a copy of your driver’s licence before you are permitted to drive a pool car.

BTT should be provided with and maintain an up-to-date record of your driver’s licence, vehicle information including MOT and Tax date, and insurance information that must include business cover before you will be permitted to use your personal vehicle for business use.

It is the driver's responsibility to ensure that the vehicle is roadworthy before every journey. This shall be done by conducting a visual check. The Health and Safety representative will carry out weekly safety checks.

The footwear and clothing that the driver of the vehicle wears whilst driving must not prevent them from using the controls of the vehicle in the correct manner. You should not drive for Breakthrough Business whilst wearing Flip flops, only socks, or whilst barefoot.

The type of fuel that BTT's pool cars use do vary. Please make sure you are putting in the correct fuel when refilling.

16 Accident, Incident and Near Miss Reporting

All employees must immediately report any work-related accidents and incidents that result in an injury or ill health to themselves, a work colleague, a student, a contractor or a visitor to the Health and Safety representative, or Line Manager if necessary. Near misses or dangerous occurrences that had the potential to cause injury must also be reported.

The Health and Safety team is responsible for investigating all report forms.

RIDDOR reportable incidents must be brought to the attention of the COO immediately, or otherwise at the soonest opportunity. The COO will make all RIDDOR reports. They will also thoroughly investigate the incident's.

Staff must comply with investigations.

17 Buildings, Grounds and Woodland

This policy covers the responsibilities and actions required from management and other employees of BTT with regards to maintaining the Health and Safety standards of its buildings, grounds and woodlands highlighted from legislation and other industry best practices.

18 Violence and Aggression in the Workplace

Work related violence is defined by the HSE as any incident in which an employee is abused, threatened, or assaulted by anyone in the course of his/her employment.

The SEN team are responsible for creating and regularly updating individual student risk assessments, which will highlight any violence, aggression, or other behavioural risks with that student.

Line Managers and the COO are responsible for conducting any other suitable risk assessments in relation to assaults on employees. A 'lessons learnt' form will be completed after an incident with the safeguarding lead, SLT and COO.

Staff must make themselves familiar with their students risk assessment and all procedures relating to violence.

In the event of an incident :

1. Keep Everyone Safe First

Staff must follow the student's risk assessment and use the least restrictive approach needed to reduce any immediate risk and keep everyone safe.

2. Record and Report the Incident

Once the situation is safe, staff must:

- Record the incident on the Trust's Health & Safety accident/incident system on the same day.
- Submit a safeguarding concern to the Designated Safeguarding Lead (DSL) through the Trust's safeguarding system before the end of the same working shift.

3. Debrief and Review

After any significant behavioural incident or use of physical intervention:

- Staff involved must take part in a debrief to check their wellbeing and review whether risk controls were effective.
- The student must also be given the opportunity for a debrief to support their welfare, wellbeing and understanding of the incident.

19 Electrical Safety

This policy applies to electrical installations and equipment owned, controlled or used by BTT. Where personal or contractor-owned equipment is used on BTT premises, appropriate checks and controls shall be applied proportionate to the risk presented.

Staff and other persons must not use their personal or other non-BTT portable electrical equipment within BTT premises without formal consent from their line-manager. Where equipment is not BTT owned (i.e. employee owned etc.), if it is in the workplace there is a legal requirement to ensure it is kept safe and all employees have duties to do so as well. Equipment owned by others (such as mobile phone chargers or laptop power supplies for example) should be subjected to the same checks as BTT-owned equipment, proportionate to the frequency of use and type of equipment.

Any electrical installation or electrical equipment must be suitable for its intended purpose and operating conditions, and only be used for its intended purpose.

Staff are responsible for visually inspecting electrical equipment before use. Any damage or faults must be reported immediately, or otherwise at the soonest opportunity. Damaged or Faulty equipment must not be used, but rather clearly labelled and taken out of action until either repaired or replaced.

All electrical equipment that is within BTT's control that has a plug, or otherwise requires a plug socket, shall be PAT tested at least every 12 months by a competent person.

Any equipment that fails a PAT test must immediately be taken out of action, and repaired or replaced at the soonest opportunity.

20 Hygiene

- You must maintain high standards of personal hygiene at all times when at work.  You must protect all open wounds with a suitable dressing, whilst at work.
- You must not consume food or drinks in a place where it is more likely to become contaminated (i.e. science rooms, art rooms etc.)
- You are expected to use and treat the toilets, washing and welfare facilities with care and respect, keeping them clean and tidy so that the risk of contamination and cross-infection are minimised.

This policy is in the development stages. Information that affects you will be brought to your attention either during the consultation stages or immediately following the policy being published.

21 COSHH

The Health and Safety Representative is responsible for maintaining an up-to-date register of COSHH substances stored at the Centre. Any new products should be brought to their attention.

Activity risk assessments must be in place that consider the use and presence of COSHH and other hazardous substances, along with the product Material Safety Data Sheet (MSDS).

Correct PPE must be worn at all times when using the substance.

When a substance is not being used, all COSHH must be stored away in the correct, appropriate lockable storage place.

Only staff that have received COSHH training and are competent to undertake the task may work with COSHH substances.

22 Managing Allergies and Medical Conditions

Students with complex medical needs, needs that require specialist treatment or may end up needing emergency care must have an Individual Healthcare Plan (IHP) in place in order to help BTT plan and care for their needs.

An IHP should also be in place for any student who will or may self-administer, or have administered, any medication (other than GSL's such as paracetamol) whilst in Breakthrough's Care.

It is in the best interest of staff to make their manager aware of any medical needs or other medication currently being taken, for in the event of an emergency.

23 Medication

All medication should be stored in the designated storage area at your Centre. Medication must be clearly labelled with the full name of the person it has been prescribed to. Other than emergency medication such as epi-pens and asthma pumps, medication must be kept locked away at all times and only accessed by authorised staff.

Breakthrough must not store any of its own spare medication (other than approved emergency AAI's and asthma pumps), and must never administer or dispense medication to a person that does not belong to them.

Staff must never dispense or administer their personal medication to a student. This includes paracetamol, sun cream, throat lozenges etc.

Only trained, authorised staff can administer medication to a student.

24 Asthma Pumps

Breakthrough Transformation Trust (BTT) has invested in spare / emergency Salbutamol Reliever Inhalers for each of its student Centres, to be used, with parental consent, where a students prescribed Inhaler is not available (for example, because it is broken, or empty).

The emergency inhaler should only be used by individuals:

- who have been diagnosed with asthma, and prescribed a reliever inhaler;
- OR who have been prescribed a reliever inhaler;

AND for whom written (parental) consent for use of the emergency inhaler has been given... ..Or otherwise if clear authorisation has been given by the emergency call handler.

25 Auto Adrenaline Injectors

Breakthrough Transformation Trust (BTT) has invested in spare / emergency Auto Adrenaline Injectors for each of its student Centres, to be used, with parental consent, where a students prescribed device is not available (for example, because it is faulty, missing or empty).

The emergency AAI should only be used by individuals:

- who have been diagnosed with anaphylaxis, and prescribed an AAI;
- OR who have been prescribed an AAI;

AND for whom written (parental) consent for use of the emergency AAI has been given...

...Or otherwise if clear authorisation has been given by the emergency call handler.

Anyone can administer an AAI to someone in anaphylactic shock during an emergency situation.

26 Automated External Defibrillator's

Breakthrough Transformation Trust has invested in emergency AED devices at some of its Centres where another device isn't available within a two minute distance. These devices must be made available to anyone, including the public, in the event of an emergency.

Anyone can use an AED in an emergency.

27 Legionella

The Legionella Management Written scheme will contain all the information and records required to control and manage legionella. It is a single-point of reference that must be easily accessible, and will be stored within the Health and Safety Management Folder.

The information that it shall, but is not limited to contain, includes:

- The Legionella Risk Assessment
- Allocations of duties
- Details as to who is responsible for what, when, how etc.
- Records of servicing and maintenance etc.
- Any other documentation, evidence or records relating to legionella and legionella management.

28 Asbestos

Breakthrough Transformation Trust (BTT) will manage, so far as reasonably practicable, all asbestos containing materials (ACM) falling under its control in such a manner as to minimise the risk of any person being exposed to asbestos fibres.

29 DSE

Every DSE workstation must have risk assessment in place, regardless of who has provided them and the person completing the assessment must be competent to do so.

DSE Users that meet the threshold of section 1.4a) of the DSE policy shall be required to have a personalised/specific documented workstation assessment for their 'normal' workstation.

Every hot desk user shall receive DSE training, and therefore will be expected to be able to identify hazards and set-up their workstation accordingly before use. All hot desks shall be subject to a generic workstation assessment, ensuring that equipment can be easily adjusted by different users to fit their needs, so far as is reasonably practicable. This shall be completed by a competent person

30 Ready for Anything

The aim of the policy is to provide a flexible framework to manage the response to any disruption or emergency, maintain critical activities, and recover from any incident quickly and efficiently. It encourages and supports pre-planning to help reduce the impact of an incident and provide preplanned course of basic actions. It is not intended to be prescriptive or to attempt to cover all possible events, as each event will require different types and scales of response, and may involve different agencies.

Policy History

Policy Version & Date	Summary of Change	Amended By	Implementation Date
1 (09/22)	Updated 22-23 Version	Sam Gilbert	September 2022
2 (09/23)	Updated 23-24 version	Sam Gilbert	September 2023
3 (8/24)	Updated 24-25 version	Sam Gilbert	September 2024
4 1/9/25	Updated 25-26 version	Angus Dugdall	September 2025
5 1/9/26	Updated 26-27 – More detail added in sections 3 & 18. Removed duplicate trustee accountability wording.	Angus Dugdall	September 2026