

NUDGE

E D U C A T I O N

Health and Safety Policy (Incorporating; Risk Assessment Policy, Accident & Safeguarding Reporting Procedure & First Aid Policy)

Sept 2022

Status; Statutory

To be Reviewed Sept 2023

This is the statement of general policy and arrangements for Nudge Education Limited;

This policy covers staff, associates/contractors (including contractors) and students of Nudge Education and applies to both premises operated by the organisation and commissions managed by Nudge Education. It aims to show how the Directorate discharge their duties under the Health and Safety at Work Act 1974. We understand the implications that not informing staff, associates/contractors(including contractors) and students of this policy and providing relevant training may cause severe harm to the people it affects and the reputation & financial health of the organisation.

Where the word 'associate' is used in the policy this refers to contractors who work on behalf of Nudge Education.

Diego Melo; Chief Executive Officer has overall and final responsibility for Health and Safety

Brian Mair; Managing Director has day-to-day responsibility for ensuring this policy is put into practice.



Brian Mair

23rd August 2022



Diego Melo

23rd August 2022

Nudge Education Health and Safety Committee;

Brian Mair (Managing Director) IOSH accredited

Diego Melo (Chief Executive Officer)

Rich Cox (Health and Safety National Lead)

External Expert Advisor:

Kym Allen Associates, Health and Safety Consultants:

<https://www.kymallanhsc.co.uk/>

01228 210152

The named organisation is appointed to provide health and safety advice and assistance as required by Regulation 7 of the Management of Health & Safety Work Regulations 19

Statement of General Policy	Responsibility of	Action/Arrangements
To prevent accidents and cases of work-related ill health and provide adequate control of health and safety risks arising from work activities	Diego Melo Brian Mair	<ul style="list-style-type: none">• Risk assessments to be completed and reviewed according to risk matrix.• Investigations of accidents should be undertaken to minimise risk of recurrence
Engage and consult with employees on day-to-day health and safety conditions	Health & Safety Committee	<ul style="list-style-type: none">• Regular face to face, electronic and verbal communications along with opportunities for planned and unsupervised learning opportunities to update knowledge• Committee meetings to discuss comments raised by staff and associates/contractors
Implement emergency procedures	Diego Melo & Brian Mair	<ul style="list-style-type: none">• Ensure all people know safe access and egress routes of buildings operated by Nudge Education or commissioned as part of an educational programme.• Have business continuity plans in place to mitigate risk of emergency.• Provide staff with training and access to emergency reporting processes through printed & electronic resources plus induction and ongoing education

		<ul style="list-style-type: none"> • Ensure any relevant incidents are reported through RIDDOR
Provide clear instructions and information, and adequate training, to ensure employees are competent to do their work	Diego Melo & Brian Mair	<ul style="list-style-type: none"> • Through training and ongoing communications with all staff, associates/contractors and students in organisation • Record Training on matrix which is held securely
Decide policy and give strategic guidance	Health and Safety Committee	<ul style="list-style-type: none"> • As part of regular business review, when new work is to be undertaken or a variation on the type of work conducted by Nudge Education. • Take external expert advice on matters relating to changes in guidance and legislation • Review accident and near miss reporting as part of this process
Monitor and review health and safety issues.	Brian Mair & Rich Cox	<ul style="list-style-type: none"> • Regular reviews of quality and compliance issues to identify risks and hazards • Conduct regular observations and spot visits to commissions to ensure safe working practices upheld • Review risk assessments and procedures on annual basis for suitability for work being undertaken. • Review RIDDOR reports to identify trends and opportunities to improve practice and process
Ensure adequate resources for health and safety are available.	Health & Safety Committee	<ul style="list-style-type: none"> • Provide first aid kits for offices operated by Nudge Education • Allocate (or approve expenses for) first aid kits for staff working with students • Ensure access to all documentation required to monitor and report H & S issues is given to relevant stakeholders

		<ul style="list-style-type: none"> • Appropriate fire suppressant equipment to be provided in buildings managed by Nudge Education
Ensure that premises used by Nudge Education are in a condition that is safe and without significant risk.	Trained Staff and Associates	<ul style="list-style-type: none"> • Conduct thorough venue-specific risk assessment of premises to be used for education purposes and ask to see relevant insurances and assessments carried out by landlord/operators • H & S committee to ensure training on how to carry out suitable assessments takes place.
Review and monitor the effectiveness of this policy.	Brian Mair	<ul style="list-style-type: none"> • Annual review to be carried out unless major change in business increases risk or scope of H & S accountability
Provide adequate welfare facilities for staff & students	All staff & associates	<ul style="list-style-type: none"> • To source suitable venues that provide opportunities for toilets, refreshments and hygiene facilities
Promote a positive, open health and safety culture.	Diego Melo	<ul style="list-style-type: none"> • Pass on findings of investigation to all relevant stakeholders
Report to Commissioners on key health and safety issues	Service Leads	<ul style="list-style-type: none"> • Update commissioners regularly on matters of H & S or changes to policy
Seek advice from other organisations or professionals, such as the Health and Safety Executive, safety advisers, Outdoor Education Advisers Panels	Health and Safety Committee	<ul style="list-style-type: none"> • Secure services of expert contractors and speak with regulatory bodies to keep up to date with changes to guidance and legislation
Ensure that all staff co-operate with the policy	Regional Leads	<ul style="list-style-type: none"> • Provide regular training opportunities and monitor staff & associates/contractors in planned and spot visit observations.

Ensure that risk assessments are reviewed on an annual basis	Brian Mair	<ul style="list-style-type: none"> • Activity to be diarised
Meet fortnightly to ensure any H & S issues are dealt with in a timely manner	H & S committee	<ul style="list-style-type: none"> • Carried out as part of the regular weekly strategic conference call and in face to face meeting on interim basis
Carry out a health and safety induction for all staff & associates/contractors /contractors and keep records of that induction	Supervisors and Managers	<ul style="list-style-type: none"> • To be recorded on their training records and signed by staff/associates. • To design relevant training programmes that are role-appropriate.
Carry out investigations into accidents and produce reports / statements for any civil or criminal action which may arise	Supervisors, Managers or any appropriate person	<ul style="list-style-type: none"> • To use the official company reporting process. • Reports to be written by more than one person to ensure robustness.
Ensure any associates/contractors & contractors are competent in health and safety matters	Recruitment and Verification team	<ul style="list-style-type: none"> • Check qualifications, DBS and references before approving to work with our students. • Training to be provided to ensure they are aware of appropriate de-escalation techniques and restraint
Understand and follow the Health and Safety Policy	Staff and Associates/contractors	<ul style="list-style-type: none"> • And sign a document to confirm this.
Comply with the Organisation's health and safety arrangements	Staff and Associates/contractors	<ul style="list-style-type: none"> • And report when this is not being followed (see whistleblowing policy)
Take reasonable care of their own and other people's health and safety	Staff and Associates/contractors	<ul style="list-style-type: none"> • Complete Risk Assessment as appropriate
Supervise students and advise them on how to use equipment safely	Staff and Associates/contractors	<ul style="list-style-type: none"> • Risk assessment to be produced to reflect this has been discussed

		<ul style="list-style-type: none"> Risk assessment to be reviewed regularly to remain current
Report practices, equipment or physical conditions that may be hazardous to their line manager and/or the appropriate member of staff	Staff and Associates/contractors	<ul style="list-style-type: none"> Report to Brian Mair initially on 07958440937 or brian.mair@nudgeeducation.co.uk
Contribute to and highlight any gaps in the organisations risk assessments	Staff and Associates/contractors	<ul style="list-style-type: none"> Using official organisational documentation
Follow the accident reporting procedure via Google Drive	Staff and Associates/contractors	
Follow safety and hygiene rules intended to protect the health and safety of themselves and others Follow safety instructions of teaching and support staff, especially in an emergency	Students	To comply with Nudge Education's agreed best practice standards

Risk Assessment Policy

Nudge Education uses a Risk Assessment Matrix as the basis for any operational activities to be carried out as seen below.

There will be a wide range of activities and situations that will require risk assessments within the day to day operations of Nudge Education. As part of the initial assessment process, there will be three standard risk assessments carried out:

- Lone/Home working Risk assessment
- Travelling by car with student
- All visits risk assessment

These will be tailored to the individual student and shared with the staff working with them prior to starting an intervention.

Further Individual student-specific risk assessments will be stored in secure folders with relevant access permissions granted to those that need to have that information. Detailed standard venue or activity-based risk assessments will be stored on the company staff portal in an effort to share best practice and knowledge to all staff and associates.

Staff and associates/contractors will be given appropriate training on how to conduct and review risk assessments prior to conducting work for Nudge Education.

		Likelihood				
		1 Rare	2 Unlikely	3 Possible	4 Likely	5 Almost Certain
Consequences	5 Catastrophic	5 Moderate	10 High	15 Extreme	20 Extreme	25 Extreme
	4 Major	4 Moderate	8 High	12 High	16 Extreme	20 Extreme
	3 Moderate	3 Low	6 Moderate	9 High	12 High	15 Extreme
	2 Minor	2 Low	2 Moderate	6 Moderate	8 High	10 High
	1 Negligible	1 Low	2 Low	3 Low	4 Moderate	5 Moderate

Risk Matrix

Risk Assessments should be reviewed on a regular basis as hazards relating to a student can change from day to day. The risk assessment should be reviewed immediately if an accident or incident occurs to reduce the chances of it happening again. Other risk assessments relating to business practices that are deemed low risk and unlikely to change will be reviewed on an annual basis.

Nudge Education operates a hierarchy of controls in relation to risk assessment as shown in the diagram below. From left to right, this is the priority that we approach hazards and risk assessment planning.



1. Eliminate the hazard



2. Reduce the hazard



3. Prevent contact with the hazard



4. Use a safe system of work



5. Use personal protective equipment

Accident, Incident, Near Miss & Dangerous Occurrence Procedure

Nudge Education will ensure that any accident, incident or near miss is reported and investigated as soon as practicable. This applies to both staff, associates/contractors and students for both intentional and unintentional cases as well as members of the public who may be affected by work carried out by Nudge Education. The duty of care to report an accident, incident or near miss is upon the person who experiences/witnesses it. The overall responsibility for investigation will lie with Brian Mair and the overall responsibility within the Organisation will lie with Diego Melo.

An accident, incident or near miss will be recorded on a detailed log by a person who experienced it or witnessed it. A safeguarding concern will also be raised using this method.

An investigation will be raised within 24 hours of the above log being completed and outcomes and findings of the investigation will be made available to all relevant stakeholders and recommendations will be implemented where required to reduce the risk of recurrence.

If any of the accidents or dangerous occurrences/near misses occur fall under the categories as listed in the HSE publication; "[Reporting accidents and incidents at work: a brief guide to the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 \(RIDDOR\)](#)"

A report must be made by an appropriate person using the forms at; <http://www.hse.gov.uk/riddor>.

All incidents can be reported online but a telephone service remains for reporting fatal and specified injuries only. Call the Incident Contact Centre on 0845 300 9923 (opening hours Monday to Friday 8.30 am to 5 pm).

A list of specified injuries and dangerous occurrences are listed in Annex B of this policy

In the event of RIDDOR being contacted, Diego Melo and Brian Mair must be informed.

First Aid Policy (Incorporating Medication Policy)

In any situation whereby tuition or engagement activities are undertaken by staff or a contractor of Nudge Education, at least one person will have valid and up to date first aid training. First aid IS NOT to be administered by anyone who is not trained, the student should be taken to the nearest walk-in centre.

A record of all qualified first aiders and details of training will be kept on record by Nudge Education and will be made available to commissioners and other bodies upon request.

An emergency contact number for each student will be kept by Nudge Education and a parent/carer will be informed as well as the commissioner if first aid is administered.

In the case of head injuries, the student will be immediately sent/taken to hospital.

For serious and life-threatening injuries, an ambulance will be called immediately whilst emergency first aid is being administered. When external venues are to be used such as libraries or community centres, part of the initial checks will be to ensure that there are trained first-aiders on site at all times.

Any first aid administered or call for emergency services will be recorded upon the Accident and Incident Log and sent to Brian Mair.

All staff and associates/contractors are will be provided with an approved first aid kit before they start their first intervention. It will be their responsibility to keep this stocked. They will also be trained in how to administer basic first aid via our learning portal.; The first-aid kits should include;

- Assorted wash proof children's plasters
- Eye pad dressings
- Triangular bandage
- Assorted size dressings
- Assorted safety pins

- Alcohol-free wipes
- Resuscitation face shield
- Sterile gauze swabs
- Disposable Gloves
- Tubular gauze
- Plastic finger applicator
- Microporous tape (1.25cm x 10m)
- Scissors x 1

Medication Policy

As part of the initial assessment Nudge Education undertakes with a student we will ask about any medication that a student has to take regularly. As part of this process we will;

- Ensure that any student that needs support in taking their own medication will be paired with a staff member or associate who is trained in the administration of medication.
- Confirm that any medication is officially labelled with the student's name and date of birth and dosage information on original packaging
- Request that the parent or guardian (including residential and care settings) will administer the medication for that student prior to the education session commencing.
- Report to our commissioner if a student requests or takes medication that is not in their initial assessment or student pen portrait to safeguard them effectively.
- If emergency medication needs to be administered in a situation that our staff or associates/contractors are not trained for, the emergency services will be contacted.
- Ensure that any medication given is recorded including information of dosage & time of administration

Fire Safety Policy;

Nudge Education currently operates a small number of offices across the country. They will not be used to deliver student interventions. In this environment the organisation will;

- Ensure all visitors are signed in and out of the premises so there is an up to date register in case of an evacuation
- All non-hardwired equipment will be PAT tested on a regular basis.
- Ensure that we have a copy of the landlord's fire risk assessment and emergency procedure policy and processes to update our staff and visitors accordingly.
- Appoint a fire warden to be the main point of contact for Nudge Education staff, contractors and visitors who are on site at the point of an emergency.
- Keep up to date plans of escape routes.
- Hold or participate in a fire drill and keep a record of this on a six monthly basis.

For sites where Nudge Education will hire on a temporary basis for education purposes, the organisation will;

- Follow all processes that the landlord requires us to for the purpose of fire safety such as drills, alarm tests and such like.
- Appoint one person who will be the main point of contact during a fire or other emergency.
- Make sure that a copy of all relevant fire and building risk assessments are seen before a hire agreement is signed.
- Complete our own H & S vetting form making sure we have noted access and egress routes, muster points, potential hazards and also accessibility options for people who have mobility problems.

- **Annex A- First Aid General Precautions**

- All cuts, grazes and skin lesions must be covered with a waterproof dressing
- Use disposable powder free latex or vinyl gloves when handling body substances
- A disposable apron must be used if there is a risk of splashing or contamination of clothing
- Take care to avoid splashes into the eyes, nose or mouth
- Spillages of body substances must be cleaned up immediately, wearing the recommended protective clothing
- Wash hands after removing gloves
- Where mains tap water is not readily available for eye irrigation, use sterile water from sealed disposable sterile containers. Each container should hold at least 300ml and should not be reused once the sterile seal is broken. At least 900ml should be provided.

Eye baths/eye cups/refillable containers should not be used for eye irrigation.

- Sterile first aid dressing should be packaged in such a way as to allow the user to apply the dressing to a wound without touching that part which is to come into direct contact with the wound. That part of the dressing which comes into contact with a wound should be absorbent. There should be a bandage or other fixture attached to the dressing and consequently there is no reason to keep scissors in the first aid box.
- Dressings, including adhesive ones, should be of a type which is appropriate for their use.

Annex B; Reportable injuries and dangerous occurrences under RIDDOR 2013

What must be reported?

Work-related accidents

For the purposes of RIDDOR, an accident is a separate, identifiable, unintended incident that causes physical injury. This specifically includes acts of non-consensual violence to people at work.

Not all accidents need to be reported, a RIDDOR report is required only when:

- the accident is work-related; and
- it results in an injury of a type which is reportable (as listed under 'Types of reportable injuries').

When deciding if the accident that led to the death or injury is work-related, the key

issues to consider are whether the accident was related to:

- the way the work was organised, carried out or supervised;
- any machinery, plant, substances or equipment used for work; and
- the condition of the site or premises where the accident happened.

If none of these factors are relevant to the incident, it is likely that a report will not be required.

See www.hse.gov.uk/riddor/do-i-need-to-report.htm for examples of incidents that do and do not have to be reported.

Types of reportable injury

Deaths

All deaths to workers and non-workers must be reported if they arise from a work related accident, including an act of physical violence to a worker. Suicides are not reportable, as the death does not result from a work-related accident.

Specified injuries to workers

- The list of 'specified injuries' in RIDDOR 2013 (regulation 4) includes:
- a fracture, other than to fingers, thumbs and toes;
- amputation of an arm, hand, finger, thumb, leg, foot or toe;
- permanent loss of sight or reduction of sight;
- crush injuries leading to internal organ damage;
- serious burns (covering more than 10% of the body, or damaging the eyes, respiratory system or other vital organs);
- scalpings (separation of skin from the head) which require hospital treatment;
- unconsciousness caused by head injury or asphyxia;
- any other injury arising from working in an enclosed space, which leads to hypothermia, heat-induced illness or requires resuscitation or admittance to hospital for more than 24 hours.

Over-seven-day injuries to workers

This is where an employee, or self-employed person, is away from work or unable to perform their normal work duties for more than seven consecutive days (not counting the day of the accident)

Injuries to non-workers

Work-related accidents involving members of the public or people who are not at work must be reported if a person is injured, and is taken from the scene of the accident to hospital for treatment to that injury. There is no requirement to establish

what hospital treatment was actually provided, and no need to report incidents where

people are taken to hospital purely as a precaution when no injury is apparent.

If the accident occurred at a hospital, the report only needs to be made if the injury

is a 'specified injury' (see above).

Reportable occupational diseases

Employers and self-employed people must report diagnoses of certain occupational

diseases, where these are likely to have been caused or made worse by their work.

These diseases include (regulations 8 and 9):

- carpal tunnel syndrome;
- severe cramp of the hand or forearm;
- occupational dermatitis;
- hand-arm vibration syndrome;
- occupational asthma;
- tendonitis or tenosynovitis of the hand or forearm;
- any occupational cancer;
- any disease attributed to an occupational exposure to a biological agent.