



Health and Safety Policy

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Scope

This document sets out the arrangements for Total People, including all MOL-branded provision, to ensure continued compliance with health and safety legislation and regulations relating to all aspects of training provision, including apprenticeships, adult learning, 16-19 education programmes and commercial learners.

For the purposes of this policy, references to Total People include MOL as a brand of Total People. This policy applies in full to all MOL-branded provision, colleagues, learners, employers, contractors, visitors, and related activities.

Our health and safety management arrangements are aligned to ISO 45001. This helps us manage risk, improve how we work and provide safe learning and working environments for colleagues, learners, employers, contractors, and visitors.

The policy supports compliance with relevant health and safety legislation by setting out arrangements for risk assessment, control measures, training, consultation, reporting, monitoring, review, and continuous improvement.

This policy supports and should be read alongside the LTE Group Health and Safety Policy Statement.

Health, safety, and welfare are a core part of Total People's wider safeguarding arrangements. This policy supports safe learning and working environments, early identification of risk, effective escalation of concerns and appropriate protection for apprentices/learners, including those who are under 18, under 25 with an EHCP, or otherwise vulnerable because of their circumstances, needs, or workplace setting.

Statement of Intent

- Provide visible leadership, accountability and sufficient resources for effective health, safety, and welfare management.
- Identify hazards, assess risks, implement proportionate controls, and continually improve health and safety performance.
- Communicate, consult, and engage with colleagues, learners, employers, contractors, and other relevant stakeholders.
- Maintain compliance with legal, regulatory, contractual, and other relevant obligations.
- Ensure colleagues are competent for the health and safety responsibilities they undertake, supported through appropriate induction, training, supervision, refresher learning and continuing professional development.

- Use inspections, observations, self-assessments, internal audits, incident reporting, reviews, and feedback to inform risk controls, governance, and quality improvement.

Introduction

Total People will make sure that the right controls, time, people, equipment, and support are in place to implement this policy effectively. We will communicate the policy clearly and make sure colleagues, apprentices/learners, contractors, and visitors understand their health and safety responsibilities.

Everyone has a part to play in keeping themselves and others safe. Colleagues, apprentices/learners, contractors, and visitors must follow this policy, work safely, and cooperate with any reasonable health and safety instructions.

Definitions

- Company means Total People, including MOL as a brand of Total People.
- Learners means all apprentices, adult learners, learners on a 16-19 education programme, commercial learners, or other individuals on a Total People programme.
- Processes means processes, procedures, guidance, and templates.
- Site means a location where work is being conducted and includes all company premises, including third party premises where our people, apprentices/learners may be working or learning. In such circumstances employees have dual responsibility for compliance with remote-working policies of the Company whilst abiding by local policies active in third party premises.
- SHE means Safety, Health, and Environment.
- Worker means a person performing work or work-related activities that are under the control of the Company.
- Works means the tasks undertaken in support of the execution of a contract by the Company.

Roles and Responsibilities

This section explains who is responsible for health and safety and what each role is expected to do.

Name	Position	Health and safety role
Melanie Nicholson	Managing Director, Total People	Accountable for implementation of the policy

Malcolm Sugden	Chair of Total People Board	Board approval and governance oversight
Head of Learner Experience	Senior operational assurance role	Coordinates relevant operational assurance with Risk & Compliance
Risk & Compliance Team	Competent health and safety support	Provides advice, audit, monitoring, investigation support and assurance
Facilities Team	Premises/statutory compliance support	Coordinates statutory inspections, premises actions and facilities-related compliance

Board of Governors

The Total People Board of Governors provides strategic oversight of health and safety and seeks assurance that appropriate arrangements are in place to meet legal and regulatory requirements. The Board must ensure that Total People have access to suitable resources, competence, training, and support to effectively manage health and safety risks and meet its legal duties. The Board's main responsibilities are to:

- approve objectives and targets, ensuring they take account of stakeholders;
- monitor and evaluate performance against objectives;
- approve the Health and Safety Policy; and
- review health and safety performance each year.

Managing Director

The Managing Director is accountable to the Board of Governors for:

- ensuring the Health and Safety Policy and associated arrangements are implemented, monitored, and maintained.
- agreeing performance standards for the management of health, safety, and welfare matters;
- ensuring coordination and cooperation where responsibilities are shared;
- ensuring communication channels are in place to resolve matters or allow escalation to leadership;
- appointing health and safety champions to support implementation of the Health and Safety Policy; and
- providing clear and visible leadership on health and safety and challenging unsafe or unhealthy behaviours.

LTE Risk and Compliance Team

The LTE Risk and Compliance Team provides competent health and safety advice, support, and assurance to help Total People meet its legal obligations and promote a positive health and safety culture throughout the organisation.

The Team is responsible for:

- providing advice, guidance and support on health, safety and welfare matters, legal requirements and recognised good practice;
- communicating significant health and safety risks, emerging issues, and recommended control measures to relevant managers;
- conducting planned inspections, audits, and assurance activities in accordance with the approved audit schedule;
- sharing audit findings and corrective actions with relevant managers and monitoring and reporting on progress against agreed actions;
- undertaking internal audits to assess the effectiveness of health and safety arrangements and reporting findings, recommendations, and opportunities for improvement to relevant managers and the Head of Learner Experience;
- providing advice and training to managers across Total People, including MOL-branded provision, in relation to health, safety and environmental requirements, legislation and best practice;
- participating in relevant health and safety forums, committees, and meetings; and
- supporting and advising on the investigation of accidents, incidents, dangerous occurrences, complaints and identified hazards, including the identification of root causes and lessons learned.

NB: The provision of advice, support, monitoring or assurance by the LTE Risk and Compliance Team does not remove or transfer health and safety responsibilities from managers, employees, or other duty holders.

NB: None of the above functions impose any duties on Safety Representatives.

Facilities Team:

The Facilities Team is responsible for promoting a positive health and safety culture throughout the company by:

- ensuring all required statutory inspections are completed and records maintained in line with relevant legislation and guidance;

- maintaining a centralised tracker for equipment inspections in line with relevant legislation;
- sharing copies of relevant statutory inspections and checks with relevant managers across Total People, including MOL-branded provision, enabling these to also be held in health and safety site folders; and
- monitoring and reporting on corrective actions and repairs required to ensure buildings are maintained to the correct standards and in line with all relevant legislation, working with relevant managers across Total People, including MOL-branded provision.

Directors and Heads of Business Areas:

Are responsible for:

- providing clear and visible leadership on health and safety matters;
- ensuring that health and safety arrangements are implemented;
- ensuring that employees, apprentices/learners, contractors, and visitors receive health and safety training;
- ensuring that colleagues are held accountable for health and safety performance, applying the same management standard to health and safety matters as to other management functions;
- monitoring and reviewing health and safety performance within their area of responsibility;
- agreeing health and safety objectives and targets with line management;
- considering health and safety matters when planning and budgeting;
- seeking advice on health and safety matters, concerns, or areas of best practice; and
- deputising for their line manager where required.

Operations and Curriculum Managers:

Operations and Curriculum Managers are responsible for providing clear and visible leadership on health and safety matters within their area. They must ensure that colleagues under their direct line management or supervision:

- receive appropriate health and safety training;
- have clear health and safety objectives; and
- are held accountable for health and safety performance.

They must also verify that:

- tasks, work environments, tools, and equipment are risk assessed, with risk assessments completed for any activity that carries risk and for all educational outings using the LTE template and signed off by two managers; and
- agreed health and safety arrangements are implemented.

Operations and Curriculum Managers must communicate relevant health and safety information, including performance against objectives and targets, known hazards, control measures, roles, and responsibilities. They must also:

- monitor health and safety performance within their department or area;
- challenge unsafe or unhealthy behaviours;
- include health and safety as an agenda item at relevant meetings;
- suspend activities where colleague or apprentice/learner safety or health may be compromised; and
- consider health and safety requirements when business planning and budgeting.

Teaching Staff:

Teaching staff are responsible for health and safety performance across their area of responsibility. They must:

- communicate control measures in place to minimise risk to colleagues, apprentices/learners, contractors and visitors;
- complete behavioural observations, inspections, and audits, where required;
- report potential concerns, incidents, accidents and near misses promptly;
- suspend activities where safety, health or the environment is being, or is likely to be, compromised;
- ensure work is conducted in accordance with specified controls;
- ensure activities involving risk to the safety, health or wellbeing of colleagues, apprentices/learners and others are appropriately risk assessed and controlled;
- ensure effective arrangements are in place for responding to emergency situations, providing first aid and reporting incidents; and
- inform their line manager of any dangers or shortcomings in the health and safety arrangements, even where there is no immediate danger.

Technicians, Compliance Officers, Premises and Support Staff:

Technicians, compliance officers, premises, and support staff are responsible for health and safety performance across their area of responsibility. They must:

- follow control measures implemented to minimise risk to colleagues, apprentices/learners, visitors and contractors;
- participate in behavioural observations, inspections, and audits, where required;
- report potential concerns, incidents, accidents and near misses promptly;
- inform their line manager of any dangers or shortcomings in the health and safety arrangements, even where there is no immediate danger; and
- ensure statutory testing programmes for equipment, such as local exhaust ventilation, pressure systems, portable appliances and lifting equipment, are completed as required.

All employees

Employees are responsible for looking after their own health and safety and the health and safety of others they work with. All employees must:

- always work safely;
- ensure work areas do not create hazards for themselves or others;
- report any concerns, incidents, near misses or learning opportunities immediately;
- complete all required induction and health and safety training;
- not misuse, disable, or interfere with any equipment provided to protect people from hazards or control risk;
- assess risk and implement controls before completing a task or activity;
- use personal protective equipment correctly; and
- assist in the investigation of injuries, incidents and near misses.

Employers of apprentices/learners:

Employers of apprentices and learners are responsible for providing a safe, healthy, and supportive working and learning environment. They must:

- implement appropriate health and safety arrangements and regularly risk assess and monitor the work environment, tools and equipment;
- provide apprentices/learners with effective supervision, training, information and instruction;
- suspend activities where an apprentice's/learner's safety or health is likely to be compromised;
- ensure apprentices/learners under their direct supervision receive health and safety training, understand their roles and responsibilities, and are held accountable for health and safety performance;
- challenge unsafe or unhealthy behaviours;

- notify Total People immediately of any accident, incident, work-related ill health, near miss or health and safety concern involving an apprentice/learner while they are at their normal place of work or on third-party premises; and
- provide full details to the relevant Learning Coach or manager, who will report the matter to the Risk and Compliance Team through TopDesk.

Apprentices and learners:

All apprentices/learners are responsible for looking after their own health and safety and that of others affected by their academic and leisure activities. Apprentices/learners have the following specific responsibilities:

- comply with all policies, guidance, and procedures in place to control health and safety risks, as well as risks to wellbeing;
- ensure that their activities do not present unnecessary or uncontrolled risks to themselves or others;
- attend appropriate induction and training;
- report any accidents, unsafe circumstances or work-related ill health;
- not interfere with any equipment provided to protect people from hazards; and
- tell the tutor or person in charge if they are not confident that they can complete a task or activity safely. Learners should not continue with an activity if this could put themselves or others at risk.

Contractors and subcontractors:

Total People will take reasonably practicable steps to ensure contractors and subcontractors are not exposed to risks to their health and safety arising from activities or premises under its control.

- Contractors and subcontractors must be told about relevant hazards, emergency procedures, and any controls they need to follow.
- Health and safety requirements will be considered when engaging contractors, subcontractors, suppliers and other third parties who may affect colleagues, learners, visitors, or the wider supply chain.
- Contractors and subcontractors must receive appropriate site induction and be made aware of emergency procedures, known hazards, access arrangements, welfare facilities, and any required PPE.
- Work must not commence until suitable risk assessments, method statements, competency evidence and any required permits or controls are in place.

- Contractors and subcontractors must follow agreed controls, use only suitable and certified equipment, and report accidents, incidents, near misses or unsafe conditions promptly.

Visitors:

Visitors to premises owned or controlled by the Company have a responsibility to look after their own health and safety and that of others with whom they come into contact.

- They must comply with warning signs and reasonable health and safety directions and instructions given to them by their host.
- Visitors are expected to inform their host of any accidents or unsafe circumstances of which they become aware.

Arrangements

Total People applies a proportionate, route-based health and safety process for employed learners, including apprentices, and for any learners undertaking work experience as part of their programme, including Study Programme learners.

Required checks must be completed, reviewed, and approved before the learner starts, with the level of completion, evidence and assurance determined by the learner's route, the industry risk rating, employer responses, and the final scored risk rating.

Part 1 is the initial employer health and safety check. It captures employer details, core compliance evidence, and risk controls, including policy, insurance, risk assessments, induction, supervision, competent person, PPE, first aid, RIDDOR, young person requirements, welfare contact, and high-risk task controls. Part 1 sections are completed according to programme route, industry risk, and employer responses.

Routes include employed apprentices, Total People advertised vacancies or recruitment-supported apprenticeships, and study programme work experience. Higher assurance is required where Total People has supported the vacancy or recruitment process, or where the learner is completing study programme work experience. Study programme work experience must include appropriate placement assurance and a work experience risk assessment before the placement starts.

The outcome of Part 1 confirms the risk level, action required and future review frequency. Low-risk outcomes may be reviewed every three to five years, medium-risk outcomes every two years and high-risk outcomes annually, or sooner where risk changes or concerns are identified.

Additional learner induction or workshop checks must be completed where required by the learner's route, age, programme type, or training environment. Health and safety must also be kept under review through progress reviews, monitoring activity, employer feedback, learner feedback, reported concerns and any changes to job role, workplace, or placement activity.

Escalation is required where key evidence is missing or unsuitable, including missing or expired employer liability insurance, no relevant risk assessment, no supervision, no competent person, uncontrolled high-risk activity, or generic or incomplete risk assessments without suitable controls. The escalation route is the health and safety inbox.

Employer agreement and monitoring

Employer health and safety responsibilities are set out in the Employers of apprentices/learners section of this policy and are reinforced through the apprenticeship training plan, employer checks, progress reviews, and monitoring activity. Employers are expected to cooperate with Total People's health and safety assurance arrangements, provide required evidence, allow appropriate monitoring, and complete any agreed actions within required timescales.

Reporting and recording health and safety accidents, incidents, ill health and concerns

All accidents, incidents, near misses, unsafe circumstances, work-related ill health, reportable illness and health and safety concerns involving colleagues, apprentices/learners, visitors, or contractors must be reported and recorded as soon as reasonably practicable. Reporting is required even where no injury has occurred, as near miss reporting helps Total People identify patterns, improve controls, and prevent more serious harm.

TopDesk is the main reporting system. Colleagues must access My Hub / Self Service Portal, select the option to report a SHE incident, choose the most appropriate category, complete the required information, and submit the record. If TopDesk is unavailable, details can be sent to the central email inbox as a backup route only.

Reports should include clear details of what happened, who was involved, where and when it happened, any immediate action taken, whether anyone was injured or affected, and any further support or control measures required. The Risk and Compliance Team will review, allocate and action reports, which may include investigation, trend analysis, review of controls, follow-up advice, or escalation.

If an accident, incident, near miss, work-related ill health, reportable illness or health and safety concern happens while an apprentice/learner is at work or on third-party premises, the

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employer and/or apprentice/learner must tell Total People as soon as possible. Details must be shared with the relevant Learning Coach or manager, who will report the matter to the Risk and Compliance Team through TopDesk where required.

Health and safety intelligence, including reporting trends, audit findings, employer review outcomes, learner feedback and safeguarding-related concerns, will be used to inform risk controls, colleague training, employer support, safeguarding governance, quality improvement activity, SAR/QIP processes and reporting to senior leaders and the Board.

Where a health and safety concern also indicates possible abuse, neglect, exploitation, unsafe supervision, unsafe working practices, learner vulnerability or wider welfare risk, staff must also follow Total People's safeguarding reporting procedures. Reporting through Top Desk does not replace the requirement to report safeguarding concerns through approved safeguarding routes.

Promoting and gaining commitment to the policy

Total People will make sure this policy is shared, understood, and supported through the following activities. Other communication methods may also be used where needed.

Colleague awareness and training

Colleagues will be made aware of this policy and their health and safety responsibilities through:

- mandatory health and safety training as part of colleague induction;
- annual refresher mandatory training;
- confirmation through the colleague induction checklist that they have read and understood the policy;
- communication following policy review or significant policy change;
- reminders and continuing professional development through regular all-colleague briefings;
- access to the policy and supporting documents on the Company intranet; and
- display of relevant health and safety information on notice boards at delivery sites.

The policy will be agreed by the Total People Board of Governors and promoted through induction, training, communication, review activity, and colleague engagement.

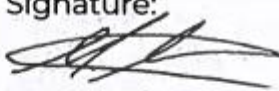
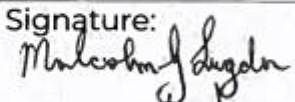
Health and safety is a standing agenda item at Total People Board meetings. The Deputy Managing Director and/or Head of Learner Experience work with the Risk and Compliance Team to provide relevant updates and assurance.

Total People will consult and communicate with colleagues about health and safety where relevant. Where significant policy changes are made, or where changes may affect colleagues, these will be shared through appropriate consultation routes, including recognised union arrangements where applicable. The Health and Safety Policy is also made available through appropriate Total People communication channels.

This policy applies to all those working in, learning at, or visiting Total People, including MOL-branded provision. This includes apprentices/learners, staff, governors, volunteers, visitors, contracted services such as agency staff, employers offering work placements, employers employing apprentices, transportation companies, contractors, and subcontractors with direct access to young people and vulnerable adults.

Signatures and review

This policy will be reviewed annually. The review date of this policy may be brought forward if there are any changes in legislation, national or local guidance before this date that are relevant to this policy. The policy will be communicated to all colleagues via I-Learn as well as being published on the Hub, on the Total People website and in the staff e-booklet issued on offer of employment.

Approver:	Melanie Nicholson	Managing Director Total People	Signature:  Date: 14/7/26.
Board Approver:	Malcolm Sugden	Chair of Total People Board	Signature:  Date: 14/7/26
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