



## HEALTH AND SAFETY POLICY

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## POLICY PURPOSE

### Our Commitment to Safety and Growth

As an employer, **Bright Futures** is responsible for comprehensive health and safety management. We are dedicated to implementing robust systems that ensure full compliance with legal requirements and fulfil our moral duty to protect our people from injury and harm.

**Bright Futures** is a place where every individual is included, encouraged to contribute, and empowered to reach their full potential.

To support this growth, **Bright Futures** must take practical steps to minimize risk and maintain a safe environment for working and learning. Our goal is to strike a purposeful balance: managing real risks effectively so that each opportunity can be experienced to the fullest.

## SCOPE

This policy applies to all employees and volunteers of Bright Futures.

This policy and procedure should be read alongside all health and safety procedures and supporting documentation at the site in which the employee is working.

This policy does not form part of any contract of employment and may be amended from time to time.

This policy will also affect the people supported by Bright Futures in its schools, children's homes or adult homes. It may also affect visitors including professionals, family, friends and advocates for the people supported by Bright Futures.

## IN BRIEF

This policy aims:

- To define the Bright Futures vision for excellence in health and safety management.
- To provide a clear summary of roles and responsibilities across all levels of the organisation.
- To outline the comprehensive management system used to oversee health and safety standards.
- To establish procedures that ensure key health and safety topics are clearly explained and understood.
- To introduce guidance documents designed to support and facilitate effective local health and safety management.

### **Continuous Improvement**

Bright Futures is a learning organisation. We are committed to both active and reactive monitoring, ensuring that suitable audits and investigations follow any incidents. We implement a cycle of continuous improvement to ensure our management systems remains effective.

This policy will be reviewed annually as a minimum, or sooner if required by legislative changes or significant organisational shifts.

### **Individual Responsibility**

While the organisation holds the primary duty of care, Bright Futures emphasises that:

- Every member of staff has a personal responsibility for their own safety and the safety of others who may be affected by their acts or omissions.
- Staff must cooperate with Bright Futures to enable the organisation to fulfil its legal duties.
- Work-life balance is essential; we strive to ensure that staff can maintain a healthy lifestyle to minimise fatigue and maximize the safety and quality of their work.

## HEALTH & SAFETY POLICY - STATEMENT OF INTENT

### Our Commitment

Bright Futures recognises and accepts its legal and moral responsibilities as an employer under the Health and Safety at Work etc. Act 1974 and all other relevant legislation. We are committed to ensuring, so far as is reasonably practicable, the health, safety, and welfare of our employees, students, contractors, volunteers, and visitors, as well as any others affected by our actions.

We believe that a safe and healthy environment is a prerequisite for achieving high-quality care and education. This policy applies to all Bright Futures employees, schools, children's homes or adult homes, serving as our unified standard for excellence.

### Our Strategic Objectives

To fulfil our commitment, Bright Futures will:

- **Create a Culture of Safety:** Strive to embed health, safety, and welfare into everyday activities, ensuring the wellbeing and mental health of staff are supported in line with our ethos.
- **Ensure Compliance:** Meet or exceed all statutory requirements and codes of practice, considering recommendations from the Health and Safety Executive (HSE) and local authorities.
- **Control Risks:** Provide adequate control of health and safety risks arising from both curriculum and non-curriculum activities through robust risk assessments.
- **Provide Safe Environments:** Maintain all places of work, plant, and equipment to ensure they are safe, secure, and healthy.
- **Competence and Training:** Ensure all staff are competent to perform their tasks by providing comprehensive information, instruction, training, and supervision.
- **Consultation and Resources:** Consult with employees and their representatives on matters affecting their health and safety while ensuring adequate resources are available for effective management.
- **Health Surveillance:** Provide health surveillance for employees where necessary and prevent accidents or cases of work-related ill health.
- **Safeguarding Integration:** Recognise the vital link between health and safety and our responsibilities under Keeping Children Safe in Education and the Bright Futures Safeguarding Policy.

## ROLE AND RESPONSIBILITIES

This section defines the clear lines of accountability required for the successful management of health and safety, from the Bright Futures Board down to every individual employee.

Within Bright Futures, health and safety responsibilities are tiered across various roles; however, it is important to note that individuals may fall within more than one category, and the responsibilities listed for 'all staff' apply universally to everyone within the organisation.

### **Bright Futures Board of Directors/Trustees**

As the employer, the **Bright Futures Board of Directors/Trustees** holds ultimate legal responsibility and accountability for the health, safety, and welfare of all employees, students, and service users across the Group.

The **Chief Executive Officer (CEO)** serves as the **Senior Responsible Officer (SRO)**, tasked with driving accountability and leading the organisation's health and safety implementation. Together, the Board and Strategic Management team ensure comprehensive compliance and a high standard of safety proficiency by:

- **Policy & Governance:** Formally ratifying and approving a signed, compliant corporate Health and Safety Policy, ensuring it is reviewed at least annually or as legislative changes require.
- **Leadership & Competence:** Ensuring the CEO fully understands their duties as the responsible person and remains competent to lead the organisation's safety strategy.
- **Strategic Vision:** Setting the organisation's vision, standards, and proactive safety culture—one that encourages candour, openness, and honesty at all levels.
- **Resource Allocation:** Ensuring the provision of sufficient and adequate resources for safety equipment, protective clothing, information, and training across Bright Futures.
- **Risk Management:** Implementing suitable management systems to assess and reduce risk whenever the total removal of a hazard is not reasonably practicable.
- **Performance Oversight:** Regularly reviewing health and safety data, compliance metrics, and incident trends (e.g., monthly) to track effectiveness and direct corrective actions or continuous improvement plans.

## **Responsible Person for Health and Safety (Health and Safety and Compliance Manager)**

Within Bright Futures, the Chief Executive Officer (CEO) acts as the 'responsible person' on behalf of the Board, holding overall accountability for the organisation's safety performance. To ensure technical excellence, the Health & Safety and Compliance Manager serves as Bright Futures designated competent person, providing expert advice and managing the day-to-day regulatory framework.

Together, they ensure the following standards are met:

- Governance and Strategic Oversight (The CEO's Role)
- The CEO ensures that the vision set by the Board is translated into action across all schools, children's homes or adult homes and sites by:
- Policy Implementation: Ensuring the Health and Safety Policy is actively implemented at every site and within every school, children's homes or adult homes.
- Effective Governance: Maintaining a governance structure that supports robust monitoring and accountability.
- Resource Management: Allocating the necessary time, training, and financial resources to manage safety effectively.
- Audit & Reporting: Overseeing a comprehensive program of governance audits and providing the Board with transparent reports on compliance, significant risks, and improvement plans.
- Technical Guidance and Management (The Health & Safety Manager's Role)  
Reporting to the CEO or Board, the Health & Safety and Compliance Manager lead the technical execution of the safety strategy by:
- Expert Advice: Providing timely, competent technical guidance to the Strategic Management team, Regional Directors, Area Managers, and Local Site Managers.
- Documentation & Standards: Leading the annual review of all policies and developing mandatory Group-wide standards for high-risk activities (e.g., Fire Safety, COSHH, and Contractor Control).
- Incident Oversight: Acting as the central point for logging all accidents and near-misses, and assuming responsibility for all statutory RIDDOR submissions to the HSE.
- Monitoring & Training: Developing independent audit schedules for schools and care homes and specifying the mandatory content and frequency for core training modules (e.g., Manual Handling, Fire Safety).
- External Liaison: Serving as the primary point of contact for the HSE, Fire & Rescue services, and Local Authority Environmental Health.
- Contractor Control: Establishing the vetting process for all external contractors to ensure they adhere to Bright Futures safety standards.

## Area Managers

The Area Manager is responsible for ensuring the consistent application and effectiveness of the Health and Safety Policy across all their designated sites (care homes and schools). They provide a vital link for communication and performance monitoring. The Area Manager will:

- Monitor and evaluate the health and safety performance of all Local Site Managers/Principals within their area, holding them accountable for their operational duties and adherence to Bright Futures policies.
- Conduct regular, structured audits of sites to provide assurance to the Head of Service that:
  - Statutory checks (e.g., fire safety, equipment maintenance) are being carried out and recorded.
  - Mandatory training compliance levels are adequate across all sites.
  - Individual and site-specific risk assessments are in place, current, and effectively communicated to staff.
  - Drive the consistent application of safe working practices, procedures, and documentation standards across all homes and schools in their area, preventing variations in quality or compliance.
  - Act as the first point of escalation for Local Site Managers who require resources (equipment, maintenance, training budget) beyond their local control, liaising with the Regional Director and Head Office to resolve shortages.
  - Facilitate the downward cascade of new or updated Group safety information, policies, and legislative changes to Local Site Managers, and provide feedback on site-level challenges and performance back up to the Regional Director.

## Registered Manager, Headteacher (or other site or department manager)

Home Managers/Principals hold the day-to-day operational responsibility for health and safety within their specific care home or school. Their duties are grouped as follows:

### 1. Risk Management and Compliance

- Own the site-specific risk assessments (e.g., fire safety, control of contractors, general environment) and ensure they are completed, regularly reviewed, and followed.
- Manage individual risk: Ensure all staff and service user/pupil risk assessments (including Personal Emergency Evacuation Plans - PEEPs) are in place, proportionate, and kept up to date.
- Maintain standards: Ensure good housekeeping and safe working standards are applied consistently across the site.
- Legal Compliance: Ensure the site and all work practices meet statutory requirements, relevant codes of practice, and guidance.

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## 2. Incident and Regulatory Reporting

- Accident Procedure: Ensure the Accident and Incident Reporting Policy and Procedure is strictly followed, and that all incidents are accurately recorded.
- Investigate all accidents promptly, in conjunction with the Bright Futures Safety Manager, to prevent recurrence.
- Ensure regulatory bodies (Ofsted, CQC) are notified of incidents in line with all statutory reporting requirements.

## 3. Staff Training and Culture

- Champion a culture of candour, openness, and honesty regarding safety at all levels.
- Ensure all staff are fully aware of the Bright Futures Health and Safety Policy and Procedures.
- Induction Training: Deliver induction training to every new employee, covering site-specific precautions, emergency procedures (e.g., first aid box, fire exits), and safe work practices relevant to their role.
- **Competence:** Ensure that staff have the necessary supervision, training, and instruction to perform their duties safely and healthily, including the provision of appropriate protective equipment and clothing when required.

## 4. Site Maintenance and Checks

- Carry out regular safety checks and audits.
- Regularly inspect and maintain the efficiency of all equipment, facilities, and emergency systems, including lighting, passageways, fire alarms, fire extinguishers, and first aid facilities.
- Ensure the site provides a safe place, safe means of entry and exit, and safe systems for the handling, storage, and movement of materials, equipment, and substances for all users (staff, supported adults & children, and visitors).
- Sufficient information, instructions, training and supervision so as to enable staff to avoid hazards and contribute positively to their own health and safety at work.

### Shift Leader (Deputy Registered Manager or Senior Residential Support Worker)/Teacher

The Deputy Manager is accountable to the Local Site Manager/Principal and is responsible for the operational implementation of the Health and Safety Policy on a day-to-day basis. Key responsibilities include:

- Act as a visible role model for all staff, demonstrating the highest standards of safety practice in all areas, particularly Moving and Handling and Positive Behaviour Support techniques.

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- Monitor staff training records locally to ensure all staff are current and compliant with mandatory health and safety training (e.g., Fire Safety, First Aid, Manual Handling).
- Ensure staff receive regular supervision and coaching focused on safe working practices and adherence to all Adult/children supported/Pupil Risk Assessments and Care Plans.
- Actively promote Bright Futures safety culture, encouraging candour and prompt reporting of hazards and near-misses by all team members.
- Conduct regular spot checks and internal audits to confirm that site-specific and individual supported Adult/children Risk Assessments are being adhered to in practice by the frontline team.
- Assist the Registered Manager with the oversight of medication administration, including auditing MAR sheets and ensuring secure storage, to minimise the risk of medication errors.
- Assume full operational responsibility for the safety of the site, staff, and service users during the absence of the Local Home Manager/Principal.
- Ensure the correct Bright Futures policies for Accident and Incident Reporting are followed and that all necessary information is gathered for escalation to the Local Site Manager and the Head Office Compliance Manager.

## All Staff

Every employee within Bright Futures holds a personal and legal responsibility to take reasonable care of their own health and safety, as well as that of colleagues, students, and visitors who may be affected by their acts or omissions.

To maintain a safe environment and a positive safety culture, all staff are expected to:

- **Compliance & Awareness:** Read, understand, and comply with all Bright Futures policies, procedures, and safety documentation. This includes following safe working practices in line with risk assessments and adhering to instructions from those in senior positions.
- **Training & Competence:** Attend all scheduled health and safety training and apply the skills and knowledge gained to daily work activities.
- **Incident Reporting:** Immediately report all accidents, near-misses, and any situation presenting a serious or immediate danger through the Bright Futures accident reporting arrangements.
- **Equipment & Workspaces:** Check that all work areas and equipment (including mobility aids and PPE) are safe before use. Use all items strictly in accordance with training and report any defects or facilities issues promptly.
- **Emergency Response:** Familiarise themselves with and follow all emergency procedures, including first aid protocols and evacuation routes.

- Supervision: Act as the first point of contact for students, children and adults in their immediate vicinity regarding health and safety, ensuring issues are managed or reported appropriately.
- Communication: Promptly raise any conflicts between job demands and safety requirements with a line manager.
- Formally disclose any personal considerations or health changes that may require adjustments to safe working methods.
- Professional Conduct: Dress appropriately for specific work activities and environments, adhering to the Bright Futures Code of Conduct and uniform policies.

## DEFINITIONS

Bright Futures arrangements will be guided by the principle of sensible risk management, focusing on the most significant risks inherent to the care and education of children and young adults with special needs.

### Risk Assessment and Management

- A General Risk Assessment will be carried out for each home and school site to cover general hazards (e.g., fire, slips, maintenance).
- Individual supported Adult/Pupil Risk Assessments are mandatory for every child/young adult, covering specific risks such as:
  - Moving and Handling: Use of hoists, wheelchairs, and transfers.
  - Challenging Behaviour: Risks of violence, aggression, self-harm, and the safe use of approved physical interventions/restraint (in line with certified training).
  - Medical Needs: Administration of medication, use of medical equipment, and allergy management.
  - Educational Activities and Visits (e.g., school trips, home visits, swimming pool use).
- Risk assessments will be reviewed: annually, after an incident, or when there is a significant change to a person supported needs or the environment.

### Manual Handling and Use of Equipment

- All employees whose duties involve the moving or handling of people must receive up-to-date and certified Moving and Handling training
- All mechanical aids (hoists, slings, stand aids) will be subject to a strict planned preventative maintenance (PPM) schedule and recorded statutory inspections.
- Individual Handling Plans must be in place and followed for every service user requiring assistance.

### Violence, Aggression, and Lone Working

- Bright Futures acknowledges the high risk of violence and aggression in this sector. Staff must be trained in approved techniques for de-escalation and positive behaviour support.

- Local site managers will conduct Lone Working Risk Assessments for all out-of-hours, community, or individual care shifts and put appropriate control measures in place (e.g., buddy systems, check-in calls, personal safety devices).

#### **Control of Substances Hazardous to Health (COSHH)**

- COSHH risk assessments will be maintained for all hazardous substances (e.g., cleaning products, disinfectants, de-icer etc).
- Safe storage (locked where necessary) and clear labelling of all hazardous substances is mandatory across all sites.

#### **Fire Safety and Emergency Procedures**

- Each site will have a comprehensive and up-to-date Fire Risk Assessment.
- Specific Personal Emergency Evacuation Plans (PEEPs) must be developed for service users and employees who cannot easily self-evacuate.
- Fire drills must be conducted at least twice yearly and include scenarios relevant to service users' needs and mobility.

#### **Training and Competency**

- Mandatory training for all staff includes Health & Safety Induction, Fire Safety, Manual Handling, Safeguarding, First Aid, and specific training for managing challenging behaviour.
- Records of all training will be maintained at the Head Office and local sites.

#### **Accident Reporting and Investigation (RIDDOR)**

- All accidents, incidents, and near-misses must be immediately recorded in the Group's reporting system.
- The Health & Safety Manager will investigate all accidents, especially those reportable under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR), to identify root causes and implement corrective actions.

#### **Welfare, Stress, and Mental Health**

- Bright Futures is committed to supporting the mental well-being of its employees.
- Stress risk assessments will be undertaken, and support mechanisms (e.g., Employee Assistance Programme, line manager support) will be communicated to all staff, especially due to the emotionally demanding nature of the work.

## **EMPLOYEE CONSULTATION AND COMMUNICATION**

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Bright Futures Care Home & Schools recognises that effective health and safety management depends on the active co-operation and involvement of all employees. Bright Futures is committed to consulting with colleagues on matters that affect their health and safety.

The Senior Management Team will ensure effective consultation through the following mechanisms:

- Health and safety will be a standing agenda item at regular **Local Site Management Team Meetings** and **Staff Team Meetings** at every home and school. Minutes relating to safety matters will be recorded and communicated.
- The Strategic Management team may establish a formal Group-wide Health and Safety Committee, which includes employee representatives from the care, education, and support functions, to review performance and policy implementation quarterly.
- All employees are encouraged to use the internal incident reporting system (for near-misses and hazards) and their supervision/appraisal process to raise health and safety concerns directly with their line manager.

Bright Futures commits to consulting employees on:

The introduction of any measure that may substantially affect their health and safety (e.g., new equipment, changes to working systems).

The planning and organisation of health and safety training.

The introduction of new or revised procedures and risk assessments.

The appointment or nomination of a competent person for health and safety (e.g., the Health & Safety and Compliance Manager).

This ensures compliance with the **Health and Safety (Consultation with Employees) Regulations 1996** and provides practical methods for involvement across the disparate locations.

## MONITORING, AUDIT AND CONTINUOUS IMPROVEMENT

Bright Futures Care Home & Schools regards compliance with the Health and Safety Policy as the minimum standard. Bright Futures is committed to the continual improvement of its health and safety performance through regular monitoring, evaluation, and review.

### Performance Monitoring

- **Active Monitoring:** Local Site Managers and Deputy Managers will routinely carry out checks and safety inspections of the physical environment, equipment, and work practices (e.g., site safety checks, personal protective equipment usage).

- **Reactive Monitoring:** All accidents, incidents, and near-misses will be recorded, investigated, and analysed to identify immediate and root causes. This data forms the basis for improving safety procedures.

#### **Audit and Review**

- **Internal Audits:** The Area Managers and the Health & Safety and Compliance Manager will conduct periodic, formal audits of all sites to measure compliance with Group standards and legal requirements.
- **External Audits:** Where appropriate, the Group will engage independent consultants or specialists to conduct external audits of specific high-risk areas (e.g., Fire Risk Assessment, Asbestos Management).
- **Management Review:** The Strategic Management Team will formally review the Group's health and safety performance data, audit results, and legislative updates at least annually to determine if the Policy and associated arrangements remain suitable, sufficient, and effective.

#### **Continual Improvement Cycle**

The Group adopts a structured "Plan, Do, Check, Act" approach to Health and Safety management:

- **Plan:** Establish the policy, organisation, and arrangements necessary to achieve the safety objectives.
- **Do:** Implement the plans and manage the risks on a day-to-day basis through safe working practices and training.
- **Check:** Measure performance against targets using audits, monitoring, and incident data.
- **Act:** Learn from the findings and review the policy and arrangements to address deficiencies, leading to a new cycle of improvement.

This cycle ensures that every incident or audit finding results in tangible action to enhance safety for service users and employees.

#### **Legal Framework:**

This policy is designed to ensure full compliance with all relevant UK health and safety legislation. Bright Futures Care Home & Schools has due regard to the requirements of, but not limited to, the following key legal instruments:

#### **Core Health and Safety Legislation**

- The Health and Safety at Work etc. Act 1974

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- The Management of Health and Safety at Work Regulations 1999 (requiring risk assessments)
- The Regulatory Reform (Fire Safety) Order 2005
- The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)
- The Workplace (Health, Safety and Welfare) Regulations 1992

#### **Specific Risk Regulations**

- The Control of Substances Hazardous to Health Regulations 2002 (COSHH)
- The Manual Handling Operations Regulations 1992
- The Personal Protective Equipment at Work Regulations 1992
- The Electricity at Work Regulations 1989
- The Gas Safety (Installation and Use) Regulations 1998
- The Health and Safety (First Aid) Regulations 1981

#### **Sector and Activity-Specific Regulations**

- The Care Act 2014
- The Education (Independent School Standards) Regulations 2014
- The Education (School Premises) Regulations 1999
- The Construction (Design and Management) Regulations 2015 (CDM)
- The Food Safety and Hygiene (England) Regulations 2013
- The Ionising Radiation Regulations 2017 (IRR17)

#### **Associated Guidance and Best Practice**

This policy is also written in accordance with current guidance and standards issued by regulatory bodies, including:

- **HSE Guidance:** (Health and Safety Executive) on safe management systems, health and safety in care homes, and sensible management in schools.
- **DfE Guidance:** (Department for Education) covering health and safety responsibilities for schools, managing hazardous materials, and "Keeping Children Safe in Education."
- **Regulatory Bodies:** Guidance from CQC (Care Quality Commission) and Ofsted relevant to the management of safe environments and provision of care.


