



Adult Skills and Education

Guildhall – EC2P 2EJ

T: 02073 323918 / 07702821650 / 07864965540

www.cityoflondon.gov.uk/adultlearning

HEALTH AND SAFETY POLICY

APPRENTICES, ADULT LEARNERS AND WORK-PLACEMENTS

QMS Reference: 1:1.9

Reviewed and revised by: Apprenticeships Quality and Performance Manager

Approved by: Head of Adult Skills, Education and Apprenticeship Service

First approved for issue on: 31 March 2021

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Owner:	External Programmes Manager*
Date of next review:	09 December 2026
Document reference number:	Q0005

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1. PURPOSE

- 1.1. This document describes the City of London Corporation's (City Corporation's) process to ensure that it is taking reasonable steps to satisfy itself that apprentices' employers and work-placements are managing the risks to learners¹ in their workplaces; in addition, that the Corporation learning venues remain safe and risks are being managed appropriately. This procedure comes within the scope of the City of London's Corporate Health and Safety Policy².

2. BACKGROUND

- 2.1. The Health and Safety at Work Act, 1974 states that it is the duty of every organisation that employs people to ensure, as far as is reasonably practicable, the health, safety and welfare at work of all its employees and to conduct its undertaking in such a way as to ensure, so far as is reasonably practicable, that persons not in its employment who may be affected thereby are not exposed to risks to their health and safety. This applies to, but not restricted to, students (*sic*), contractors, visitors, passers-by and even to anyone who breaks into the premises.
- 2.2. The City of London Corporate Health and Safety Policy covers all those enrolled in learning (learners) through its Adult Skills and Education Service within the Department of Communities and Children's Services. Under this process, attention is paid to the safety of learning resources and the provision of appropriate arrangements for health and safety to protect staff and learners from harm.
- 2.3. Many of the City of London Corporation's learners, particularly those who are apprentices, learn as part of their job. The Health and Safety Executive (HSE) has published guidance³ on the respective responsibilities of employers and training organisations for Apprentices and individuals on work placements or on work experience with employers organised by the City Corporation.
- 2.4. The HSE guidance³ is that the employer has the primary responsibility for the health and safety of the apprentice and those on work experience⁴. The employer should be managing any significant risks. The effectiveness of the employer's risk management arrangements is what matters. Employers should already be managing the risks in their workplaces and are best placed to assess whether or not they need to do anything additional for a new person joining them.

3. BASIS FOR THE PROCESS

¹ The term 'learners' includes apprentices and those on other programmes

² HSP1 – City of London Corporation (CoLC) Health & Safety Policy (Corporate), available at [HSP01 Corporate Health & Safety Policy](#)

³ Apprentices: [Managing for health and safety \(hse.gov.uk\)](http://www.hse.gov.uk/youngpeople/)

Work Placements: [Young people at work - work experience - HSE](#)



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- 3.1. The responsibility for the implementation of the City of London Corporation’s Health and Safety Policy within the Adult Skills and Education Service rests with the Head of Service.
- 3.2. The HSE guidance suggests that a training organisation should take reasonable steps to satisfy itself that the employer is managing the risks. In doing this, training organisations can rely on past experience, for example, if the employer is familiar to the organisation and they have a good track record on health and safety. It does not mean trying to second guess an employer’s risk assessment or risk control measures. There is no requirement for the training organisation to carry out its own workplace assessment.
- 3.3. The HSE also recommends that checks should be kept in proportion and suggests that training organisations should simply ask sensible questions, in proportion to the level of risk, to satisfy themselves that those arrangements are in place that are proportionate to the environment. For low-risk environments, such as an office or shop, with everyday risks that will mostly be familiar to the learner, simply speaking with the employer to confirm this should be enough. This can be part of any wider conversation on placement arrangements that may take place. For environments with less familiar risks, like light assembly or packing facilities, training organisations should talk to the employer to find out what the apprentice will be doing and confirm the employer has arrangements for managing risks, including induction, training, supervision, site familiarisation, and any protective equipment that might be needed. For higher risk environments such as construction, agriculture, animal handling sites or manufacturing, the training organisation should discuss with the employer what the apprentice will be doing, the risks involved and how these are managed, satisfying itself that the instruction, training and supervisory arrangements have been properly thought through, as well as the issue of appropriate Personal Protective Equipment (PPE), where required. Training organisations should not second-guess employers’ risk assessments or require additional paperwork.
- 3.4. Training organisations should check that each learner knows how to raise any health and safety concerns.
- 3.5. Ofsted also identifies its approach to judgements on health and safety, which has regard to the guidance from the HSE about the relative responsibilities of the training provider and the employer and in particular that the employer has primary responsibility for the health and safety of the learner and should be managing any risks. In addition, Ofsted will consider the extent to which the training organisation:
 - Takes reasonable steps to satisfy itself that the employer is managing the risks.
 - Keeps checks in proportion to the level of risk, which will vary in relation to the type of working environment involved.



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- Avoids seeking paperwork for assurance purposes, using an exchange of emails or correspondence to provide an audit trail if this is needed.
- Does not try to ‘second guess’ the employer’s risk assessments by undertaking their own.

3.6. The HSE and Ofsted guidance on appropriate health and safety activities for training organisations form the basis for the process described in this document.

4. DETERMINING THE HEALTH AND SAFETY RISK FACTOR OF A JOB ROLE

4.1. The health and safety risk within a job role is primarily dependent on the tasks an individual has to perform and the context in which those tasks are undertaken (usually determined to a large extent by the business activities of the organisation). For example, an administration role in an office is generally taken to be low risk but if that office is a hut in the middle of a large construction site and the role involves collecting and delivering post to a number of other huts scattered around the site that are also used as offices then the risk is increased.

4.2. In general, learners working in an office type environment on tasks that do not require materials handling; working with chemicals; working at heights; working with sharp implements; working with electricity or gas supply; or in confined spaces are usually low risk environments. Medium risk environments can include kitchens; hairdressing salons; shops where stock is stored above head height; and light assembly plants. High risk environments are usually associated with activities in environments such as construction, manufacturing and engineering; agriculture and horticulture; animal handling; energy generation and supply; production and use of chemicals in volume; and any activity that requires working at heights or in confined spaces; and working with moving machinery including vehicles.

5. PROCESS

5.1. Following an enquiry from an external employer about recruiting an apprentice, the employer will be visited to discuss their requirements and the employer’s proposed job description(s) for the apprentice(s) they wish to employ. From this visit and the job description(s) the apprentices’ roles will be categorised as low, medium or high risk following consultation with the Head of Service or the Apprenticeships Quality and Performance Manager as necessary.

5.2. Employers with apprenticeships rated medium or high risk will be visited by a team member of the Service to ensure that the employer has the necessary and sufficient systems and processes in place to manage the risks to each apprentice before any apprenticeship applicants are referred to the employer. Essential information on the employer’s health and safety arrangements are gathered during this visit using the form shown in Annex 1. This record contains only factual information about the



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employer. It does not require any judgement on the effectiveness of the employer's health and safety arrangements to be made. If an apprentice's role is judged to be low risk anyone from the recruitment team can collect the information. If the role is medium or high risk then a competent person visits the employer to gather the information and investigate the employer's approach to managing risk by, for example, investigating the employer's approach to each apprentice's induction, training, supervision, site familiarisation, and any protective equipment that might be needed. For high risk roles, the Service's representative will discuss with the employer the risks involved and how these are managed to be satisfied that the instruction, training and supervisory arrangements have been properly thought through.

- 5.3. The Service will not carry out risk assessments of apprentices' roles.
- 5.4. For existing, familiar employers, the Service will take into account their track record on health and safety considering their management of risk to their apprentices to ensure that the employers are not overburdened consistent with the need to protect the health and safety of the apprentices.



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ANNEX 1: EMPLOYER HEALTH AND SAFETY DATA SHEET



EMPLOYER HEALTH & SAFETY DATA SHEET

Employer Name		Number of Employees	
Nature of Business			
Workplace Address		Main Contact (Name & Tel. No.)	
		Health and Safety Contact (Name & Tel. No.)	
Learner Name			
Supervisor Name			
Type of Work carried out at Workplace location			

1	Health and Safety Policy and Procedures	Yes/No	Evidence/Comments Please indicate whether or not the existence of documents and records has been verified
A	Does the organisation have a health and safety policy? (Written policy statement mandatory when 5 or more employees)		
B	Who is the responsible person for the site?		
C	Is there a health and safety manual at the site?		
D	Is there a procedure for communicating health and safety related updates and issues to employees?		

2	Risk Assessment and Control	Yes/No	Evidence/Comments
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			Please indicate whether or not the existence of documents and records has been verified
A	Have risk assessments been carried out across all employees? Are these recorded?		
B	Is there a written risk assessment for the role to which the apprentice is being appointed taking into account their age, inexperience, immaturity and lack of awareness of risk?		
C	Does the employer provide, free of charge, all necessary personal protective equipment and clothing (as determined by the risk assessment) and ensure its proper and effective use?		
D	Are records of risk reduction activities at the site kept?		
E	Are all required safety signs, including those identifying emergency exit routes, in place?		

3	Accident, Incident and First Aid	Yes/No or enter number	Evidence/Comments Please indicate whether or not the existence of documents and records has been verified
A	Are records kept of accidents or illness and first-aid treatment rendered?		
B	Are accident and incident records analysed to identify and implement corrective actions?		
C	How many employees at the site are trained first-aiders?		
D	How many accidents, incidents and ill-health have been reported under the RIDDOR ⁴ regulations during the last three years?		
E	If there have been one or more reportable accidents or incidents during the last three years, is there a record of mitigating action(s) taken following the accident or incident?		

⁴ Reporting of Injuries, Diseases and dangerous Occurrence Regulations 2013



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4	Supervision, training, information and instruction	Yes/No	Evidence/Comments Please indicate whether or not the existence of documents and records has been verified
A	Have supervisors received training in the specific hazards within the organisation and how these risks need to be controlled?		
B	Are employees given health and safety information, instruction and training on appointment and ongoing thereafter?		
C	Are records kept of the health and safety information, instruction and training given to employees?		

5	Fire safety	Yes/No	Evidence/Comments Please indicate whether or not the existence of documents and records has been verified
A	Are effective means of escape in place including unobstructed routes and exits?		
B	Are fire drills carried out?		If yes, at what frequency?
E	Is a fire log/record book kept?		

6	Safe and healthy working environment	Yes/No	Evidence/Comments Please indicate whether or not the existence of documents and records has been verified
A	Is the working environment (temperature, lighting, space, ventilation, noise, cleanliness) an appropriate safe and healthy one?		
B	Are welfare facilities (toilets, washing, drinking, eating, changing) provided as appropriate and maintained?		

7	General health and safety management	Yes/No	Evidence/Comments
A	Does the employer have access to competent health and safety advice and assistance?		
B	Is the employer’s liability insurance current and is other insurance in place as appropriate to the business undertaking?		Insurer’s name: Policy Number: Expiry date:



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Signed for Employer: : _____

Position: _____

Signed for City of London: _____

Position: _____