Train'd Up's Learner Health and Safety Reporting Process

1. Purpose

This process outlines how health and safety concerns involving learners are reported, managed, and escalated. These include, but are not limited to:

- Unsafe practices in the learners' workplace or at a Train'd Up training venue
- Learner incidents in the learner's workplace or at a Train'd Up training venue
- Learner accidents in the learner's workplace or at a Train'd Up training venue
- Learner near misses in the learner's workplace or at a Train'd Up training venue
- Dangerous occurrences involving learners

See Appendix 1 for definitions

2. Scope

This process applies to all learners' studying with Train'd Up including those where subcontracting arrangements are in place.

All Train'd Up employees who engages with learners and employers are responsible for reporting health and safety concerns as and when they are identified including that of subcontracted provision.

3. Responsibilities

Train'd Up recognises that they have a duty of care for all learners both in their workplace and within any of its training venues.

This process supports compliance with:

- Health and Safety at Work Act 1974
- Current apprenticeship funding rules
- Safeguarding and Prevent duties
- Ofsted expectations regarding learner welfare and wellbeing

3.1 Employer responsibilities

The employer is responsible for:

- Providing a safe working environment.
- Carrying out workplace risk assessments.
- Delivering health and safety training.
- Providing appropriate Personal Protective Equipment (PPE).
- Reporting and investigating workplace incidents.
- Complying with all relevant health and safety legislation.

- Supporting the learner's welfare and wellbeing.
- Report and health and safety concerns, accident, incidents and near misses to Train'd Up

3.2 Train'd Up responsibilities

Train'd Up is responsible for:

- Monitoring learner health and safety during progress reviews, learner interactions and client meetings
- Report any health and safety concerns witness or disclosed
- Investigate concerns
- Referring concerns to the employer where appropriate.
- Maintaining records of concerns and actions taken.
- Maintain training venues in line with health and safety requirements

3.3 Learner responsibilities

The learner is responsible for:

- Following the employer's health and safety procedures.
- Following health and safety procedures laid out by Train'd Up in their training venues.
- Reporting incidents, hazards, and near misses immediately to their line manager in accordance with the employer's procedures and to Train'd Up.
- Report to a Train'd Up employee if there are any health and safety issues that are affecting their learning or wellbeing.

4. Identifying Health & Safety Concerns

Health and safety concerns may be identified through:

- Progress reviews.
- Professional discussions.
- Work scrutiny
- EPA preparation meetings.
- Emails or telephone conversations.
- Learner disclosures.
- Employer communications.
- Observations

5. Managing health and safety concerns

5.1 Unsafe practices and dangerous occurrences

Classification	Examples	Train'd Up employees' actions	Reporting timeframe
Level 1 – Serious Risk	Unsafe machinery use Missing or inappropriate PPE Dangerous working environment learner undertaking tasks beyond competence Unsafe supervision levels Illegal or clearly unsafe working practices	Stop the activity if it presents immediate danger and it is safe to do so Remove the learner from the unsafe activity Encourage the apprentice to report the concern through their employer's reporting process. Inform the employer or supervisor on site End the visit if safety cannot be assured Report the issue	Within 1 hour
Level 2- Significant Risk	Poor adherence to safety procedures Inadequate supervision Missing documentation or risk assessments Unsafe environment developing over time	Encourage the apprentice to report the concern through their employer's reporting process. Record the details and obtain details of any action already taken Raise the concern with the employer supervisor Report the issue	Within 24 hours
Level 3- Minor Risk	Housekeeping issues Minor PPE compliance Documentation gaps	Encourage the apprentice to report the concern through their employer's reporting process. Record the details and obtain details of any action already taken. Discuss with employer Report the issue Monitor at next visit	Within 72 hours

5.2 Accident, Incident, Near Miss

Classification	Examples	Train'd Up employees' actions	Reporting timeframe
Level 1- Serious Incident	A serious event where there has been actual harm, or a clear potential for serious	Ensure the learner is safe Stop the activity if it is safe and appropriate to do so	Immediately

	harm, to a learner or another person. Examples include but are not limited to: Fatality or life-threatening injury Injury requiring emergency medical treatment, ambulance attendance or hospital attendance Suspected fracture, loss of consciousness, serious burn, eye injury, crush injury or amputation risk Fall from height or serious slip/trip/fall Fire, explosion, electric shock, gas leak or chemical exposure Machinery, vehicle, lifting equipment or tool-related incident with serious injury potential Collapse or failure of equipment, structures, racking, scaffolding or guarding Violence, serious aggression or threat of harm in the workplace Learner asked to continue working after an injury or unsafe event Any incident likely to be RIDDOR reportable, including specified injuries or dangerous occurrences	Seek first aid or emergency assistance where required Inform the employer, supervisor or responsible person immediately Remove the learner from the activity or environment if safety cannot be assured Do not investigate blame or attempt to resolve serious safety failures personally Submit a heath and safety Report immediately Escalate to the Designated Safeguarding Lead and Quality Director the same day	
Level 2- Significant Risk	An event where harm has occurred, or could have occurred, but the immediate risk is controlled, and the outcome is not serious. Examples include but are not limited to: Minor injury requiring first aid Minor burn, cut, strain, bruise or impact injury Slip, trip or fall without serious injury Tool, equipment or machinery incident with limited harm Near miss involving unsafe movement of vehicles, equipment or materials	Check the learners' wellbeing Confirm that first aid has been offered where appropriate Raise the matter with the employer or supervisor Confirm what immediate action the employer has taken Record the incident, including a learner's account where appropriate Submit a health and safety Report Escalate to the Designated Safeguarding Lead where there are welfare, supervision or employer conduct concerns	Within 24 hours

	Learner exposed to poor practice but not immediate serious danger Repeated minor incidents suggesting weak supervision or unsafe working habits Failure to follow safe systems of work where the risk was significant but did not result in serious harm		
Level 3- Minor Risk	A low-level event with no injury, or very minor impact, where there is limited ongoing risk, but the issue should still be recorded and monitored. Examples include but are not limited to: Very minor bump, graze or discomfort not requiring first aid Isolated low risk near miss Minor manual handling concern Minor housekeeping issue that nearly caused a slip or trip Learner reports feeling unsafe, but no immediate danger is identified Low-level failure to follow PPE or local safety procedure Minor incident that has been addressed immediately by the employer or tutor/ coach	Discuss the matter with the employer Confirm what corrective action has been taken Record the issue Submit a health and safety Report Monitor at the next visit or review	Within 72 hours

5.3 Guardrails for Stopping Training

Train'd Up employees may pause or stop training activities if:

- There is reasonable belief that the learner is at risk of harm
- Safety controls are clearly inadequate
- The learner is asked to undertake tasks outside their competence
- There is no appropriate supervision

Employees must not attempt to resolve serious safety issues themselves.

Their responsibility is to protect the learner and escalate.

6. Reporting heath and safety concerns

6.1 Internal reporting

Health & Safety incidents must be reported via Train'd Up's Health & Safety Incident Report Form

All Level 1 and Level 2 reports should be escalated to the Designated Safeguarding Lead. Level 1 incidents must also be escalated to the Quality Director on the same working day.

Review timeframes:

- Serious Risk – within 1 hour
- Significant Risk – within 24 hours
- Minor Issue – within 72 hours

All health and safety concerns reported will be recorded in the Health & Safety Incident Log via HubSpot, including:

- Incident details
- Risk classification
- Actions taken
- Employer response
- Resolution

All report form submissions will automatically populate the Health & Safety Incident Log via HubSpot.

6.2 Classification guidance

Where there is uncertainty, employees should classify the event at the higher risk level and allow the internal review process to confirm whether it can be downgraded.

The classification should consider:

- The actual harm caused
- The potential worst-case outcome
- Whether the learner remains at risk
- Whether supervision was adequate
- Whether the learner was working within competence
- Whether safety controls were in place and being followed
- Whether the event may indicate wider employer health and safety concerns
- Whether the incident also raises safeguarding concerns

A near miss should not automatically be treated as low risk. A near miss with the potential for serious injury, such as a vehicle near miss, machinery incident, falling object or electrical exposure, should normally be classified as Level 1 or Level 2, depending on severity and likelihood of recurrence.

6.3 RIDDOR Reporting

Where an incident may be RIDDOR reportable, the employer or person in control of the premises will usually be the responsible person for external reporting. Train'd Up should record whether the employer has considered or completed any required RIDDOR notification. HSE guidance states that employers, self-employed people and those in control of work premises are responsible for reporting certain serious workplace accidents, diseases and dangerous occurrences.

Train'd Up employees are not expected to determine legal liability or make formal RIDDOR reports on behalf of employers unless specifically authorised to do so.

However, they must:

- Record whether the event may be RIDDOR reportable
- Ask the employer to confirm what reporting action has been taken
- Escalate internally where the employer fails to take appropriate action
- Record all employer responses and follow-up actions on HubSpot.

Where an incident occurs within a Train'd Up training venue and RIDDOR reporting lies with Train'd Up, Train'd Up's Heath and Safty Policy will be followed.

7. Confidentiality

Information will be handled confidentially and shared only with those who need it to manage the concern, while complying with data protection legislation.

8. Relationship with Safeguarding

Where a health and safety concern also raises safeguarding or welfare issues, the concern must be managed in accordance with the organisation's Safeguarding Policy. Health and safety and safeguarding procedures may run alongside one another where appropriate.

Where a workplace health and safety concern also indicates:

- Exploitation
- Neglect of learner welfare
- Unsafe supervision
- Bullying or coercion

The issue must also be referred to the Safeguarding Team.

Health & safety concerns may therefore become safeguarding incidents.

9. Investigating health and safety concerns

9.1 Health and safety concern at a learner's workplace

Following internal review, Train'd Up may:

- Inform the employer of concerns
- Request corrective actions
- Conduct additional monitoring visits
- Suspend workplace training if risks remain unresolved

All communication with employers will be documented on HubSpot.

9.2 Health and safety concerns at a Train'd Up venue

These will be managed following Train'd Up's Health and safety policy

9.3 Follow up

Incidents remain open until:

- Employer actions have been completed
- Safety risks have been addressed
- A follow-up visit confirms improvements

9.4 Possible outcomes

- Discussion with the employer's apprenticeship lead.
- Referral to senior management within the employer.
- Employer action plan
- Additional workplace safety review
- Temporary suspension of training and recruitment
- Consideration of whether the apprentice should continue their programme until concerns are addressed.
- Safeguarding escalation where appropriate
- Referral to the relevant regulatory authority where there is evidence of serious or persistent risk and internal escalation has been exhausted.
- Permanent suspension of training and recruitment

10. Health and safety Monitoring

Health and safety concerns will be reviewed periodically to identify trends, recurring issues, or employer-specific concerns. Findings may be used to inform employer engagement, quality improvement activities, and risk assessments.

The log will be reviewed monthly to identify patterns or high-risk employers, and the analysis will be reported to the Quality Board on a quarterly basis.

Level 1 incidents should also be reported to the Quality Director.

Records should be retained in accordance with Train'd Up 's data retention and safeguarding policies

11. Responsibility

Overall responsibility for this policy and procedures rests with the Quality Director.

12. Monitoring and review

Train'd Up will review the process annually as part of its annual self-evaluation arrangements and revise it as and when necessary, in response to customer and learner feedback, changes in its practices, advise from the regulatory authorities or external agencies, changes in legislation, or trends identified from previous instances of health and safety concerns

In addition, this policy may be updated in light of operational feedback to ensure our arrangements for dealing with health and safety concerns remain effective.

13. Director Policy Approval

This Process is reviewed as a minimum on an annual basis and is approved and endorsed by the Senior Leadership Team.

Signed on behalf of Company Directors:



Name: Fallon Southwell

Position: Quality Director

Date: 14/07/2026

14. Document management

Owner: Quality Director

Effective Date: 13/07/2026

Next Review Date: 12/07/2027

Document reference: Learner health and safety reporting process V1.0

15. Change History Record

Version control	Substantive change narrative	Author of substantive change	Date of substantive change
1.0	Process created	Lucy Auchincloss	13/08/2026

16. Appendix

Appendix 1: Definitions

Health and safety concern	Definition
Unsafe working practices	Practices in the workplace that have the potential to cause an accident, incident or near miss. Such as: • Unsafe working practices. • Inadequate supervision. • Fatigue affects safe performance. • Bullying or behaviours that create safety risks. • Lack of required training or PPE. • Unsafe rostering or working conditions.
Dangerous occurrence	A serious near miss or incident with high potential to cause death or serious injury. Some dangerous occurrences are reportable under RIDDOR.

Incident	An unplanned event, situation or occurrence that has caused, or could have caused, harm, injury, ill health, damage or significant disruption.
Accident	An unplanned, unintended and identifiable event that results in injury, ill health or physical harm. Under RIDDOR, an accident is a type of incident that is separate, identifiable, unintended and causes physical injury.
Near miss	An unplanned event that did not result in injury, harm or damage, but had the potential to do so. Near misses must be taken seriously because they can provide valuable insight into how well health and safety risks are being managed.