



# Health and Safety Policy

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# General Policy Statement



*PGL understands and fully accepts its obligations in respect of health and safety in the workplace and is fully committed to providing a healthy and safe working environment for all colleagues, guests, co-workers, visitors and others who may be affected by its operations across all UK and overseas Centres and offices.*

PGL considers that successful management of health and safety is a key part of its overall business strategy and will seek opportunities for continuous improvement on an ongoing basis.

PGL is, as far as is reasonably practicable, committed to fulfilling its obligations under the Health and Safety at Work etc. Act 1974 and all other applicable legislation.

## **PGL is committed to:**

- Preventing a personal injury, occupational illness and creating a safe environment
- Ensuring, so far as is reasonably practicable, that colleagues do not work in unsafe conditions and will welcome feedback from colleagues where health, safety and welfare matters can be improved
- Minimising loss caused through near misses, fire and other operational activities
- Providing adequate resources to ensure continued improvement in health and safety management and performance
- Developing a positive health and safety culture throughout the organisation by increasing awareness and engagement to promote a positive and proactive 'safety first' culture
- Identifying risks and opportunities and implementing controls to effectively manage them
- Providing suitable information, instruction, training and supervision to maintain required competency levels throughout the organisation
- Ensuring that appropriate information and guidance is provided to all employees and customers in respect of safe practices, identified risks and hazards and the control measures in place
- Ensuring that all guests and colleagues are aware of their health and safety responsibilities
- Ensuring that an effective employer/colleague health and safety consultation process exists





# Responsibilities



## Anthony Jones

### Chief Executive Officer

The CEO is responsible for all health and safety matters at PGL will:

- ✓ Give direction on communication of the health and safety policy at all levels and across all areas of the business
- ✓ Provide leadership and set a personal example to promote a positive health and safety culture
- ✓ Provide adequate resources and funds to support effective implementation of the health and safety policy
- ✓ Appoint a Director responsible for the provision of strategic health and safety advice to the board
- ✓ Consider and approve recommendations from the Director responsible for health and safety regarding changes to policy and procedure
- ✓ Require the Director responsible for health and safety to regularly report to the PGL Board on health and safety implementation and performance
- ✓ Provide on-going commitment to continuous improvement in health and safety performance and develop the collective vision and direction necessary to comply with and exceed where possible the relevant statutory provisions
- ✓ Ensure that PGL consults with colleagues on matters relating to health and safety at work and that proposals from colleagues on such matters receive proper consideration
- ✓ Obtain and share advice with the Board on the interpretation and compliance with relevant health and safety legislation, guidance and good industry practice
- ✓ Ensure that health and safety objectives are adopted and embraced by the PGL Board
- ✓ Through the Director responsible for health and safety, take reasonable steps to ensure systems are established to monitor and review the health and safety performance and that they are implemented and maintained.

*Anthony*



## PGL Board of Directors

The Board, in line with current legislation and best management practice, are responsible for health and safety matters within their control and will:

- ✓ Ensure that the health and safety policy is effectively implemented within the areas under their control together with arrangements necessary to maintain compliance with statutory requirements
- ✓ Assign responsibilities for day-to-day management and monitoring of health and safety issues within all the functions under their control
- ✓ Communicate and promote the use of the health and safety policy and procedures within all functions under their control
- ✓ Provide leadership and set a personal example to promote a positive health and safety culture
- ✓ Effectively communicate to all colleagues within all functions under their control on matters of health and safety
- ✓ Ensure that suitable risk assessments and safe systems of working are developed and implemented within functions under their control
- ✓ Ensure that colleagues within functions under their control undertake health and safety training appropriate to their role and responsibilities as directed
- ✓ Advise the Director responsible for health and safety of any significant health and safety issues that may affect the corporate body
- ✓ Include health and safety as an agenda item at all meetings and forums within all functions under their control

## Director of Health & Safety and Operational Services

The Director of Health & Safety and Operational Services is responsible for ensuring that standards of health and safety across PGL meets or exceeds legal and industry standards and will:

- ✓ Recommend, monitor and track health and safety objectives and improvement targets and provide periodic feedback on progress to the PGL Board through regular reports
- ✓ Report to the PGL Board on matters of health and safety performance
- ✓ Provide health and safety advice to the PGL Board and business groups as necessary to ensure the effective planning and delivery of an effective health and safety management system
- ✓ Ensure that the PGL health and safety policy, general arrangements and procedures are kept under review and formally reviewed at regular intervals
- ✓ Ensure that the safety management system is updated as required to reflect changes in legislation, guidance or best practice
- ✓ Ensure a suitable and robust health, safety and compliance audit programme is delivered
- ✓ Oversee and provide feedback on the success of auditing and inspection programmes
- ✓ Ensure that all accidents, incidents, near misses and dangerous occurrences are reported and investigated thoroughly and where necessary reported promptly to the enforcing authority
- ✓ Ensure that accident statistics are collated and where necessary corrective action is taken
- ✓ Ensure that new legislative requirements which will have an impact on the business are identified and reviewed after consultation with stakeholders prior to implementation
- ✓ Undertake a formal review of the effectiveness of the safety management system and make recommendations for continuous improvement
- ✓ Obtain technical advice where necessary



# Managers

Managers are responsible for health and safety matters within all functions under their control. Additionally, Managers are responsible for implementing the health and safety policy and management standards within their own area of management responsibility and will:

- ✔ Provide leadership and set a personal example to promote a positive health and safety culture
- ✔ Develop and implement suitable risk assessments and safe systems of working within functions under their control
- ✔ Implement measures to monitor health and safety performance within functions under their control and, and where necessary, take corrective action
- ✔ Recognise and reward employees who show positive health and safety behaviours and encourage employees to suggest improvements
- ✔ Include health and safety as an agenda item at all meetings within all functions under their control
- ✔ Seek advice from the Safety and Compliance Team when necessary
- ✔ Commit to and cooperate with all measures to progress safety matters within their remit
- ✔ Positively respond to audit outputs carried out across functions under their control
- ✔ Ensure that any specific legislation associated with their remit is adhered to
- ✔ Ensure that employees responsibilities are fully adopted by all functions under their control

# All Colleagues

In the UK the Health and Safety at Work etc Act 1974 places duties upon all employees. All PGL colleagues will:

- ✔ Take reasonable care for the health and safety of themselves and of persons who may be affected by their acts or omissions whilst at work
- ✔ Co-operate with the employer to enable them to carry out their legal duties or any related requirements that may be imposed
- ✔ Not intentionally or recklessly interfere with or misuse any item provided in the interests of health and safety

In addition, colleagues shall:

- ✔ Report all accidents and incidents and report all unsafe practices or potential hazards regardless of location
- ✔ Attend and complete any necessary health and safety training within the required timeframe
- ✔ Only carry out tasks for which they are trained in and work within the constraints of the task risk assessment and safe system of work
- ✔ Adhere to any procedures or manufacturers recommendations that are provided regarding hazardous substances or machinery used at work
- ✔ Not consume or abuse alcohol whilst at work as this represents a risk to one's own and others' wellbeing
- ✔ Not participate in the taking of drugs (other than those prescribed by a Doctor) whilst at work
- ✔ Failure to adhere to PGL policies and procedures may lead to disciplinary action being taken





# Arrangements

## Risk Assessment

Under the Management of Health and Safety at Work Regulations 1999, employers have a legal duty to assess the risks to health and safety from any aspect of their operations. PGL has developed a Risk Assessment Policy to detail how risks are assessed.

Department Managers are responsible for ensuring that suitable and sufficient risk assessments are in place to manage the risks present within their Department or the activities undertaken by those working in that Department.

All PGL risk assessments are reviewed at regular intervals or following a serious event to ensure they remain suitable and sufficient.

### Safe Systems of Work

Department Managers are responsible for ensuring that suitable and sufficient safe systems of work are in place to safely undertake departmental tasks.

All PGL safe systems of work are reviewed at regular intervals to ensure they remain suitable and sufficient.

### Health and Safety Training

In line with the Health and Safety Training Policy PGL provides appropriate health and safety training to all Colleagues in line with training needs. Training needs are identified via risk assessment, statutory requirements, customer feedback, employee feedback, audits, best practice and industry standards.

Working closely with General Managers and Support Centre Managers, training needs are identified and facilitated by People and Culture Team or the People Development Team.

The People Development Team maintains a consistent standard of training delivery across all Residential Centres and Support Centres to ensure appropriate levels of competence.

Examples of appropriate health and safety training delivered to Colleagues are::

- Fire safety
- Fire marshal
- First aid
- COSHH
- DSE
- Driving

At least one member of the management team at each centre will hold a formally recognised health and safety qualification as detailed in the Health and Safety Training Policy.







## Accident, Incident and Safeguarding Reporting and Referral

All accidents, incidents, dangerous occurrences, illnesses, occupational ill health and safeguarding incidents arising from PGL's work related activities will be reported in accordance with the [Accident and Incident Policy, and the Safeguarding Policy](#).

Specific regard is taken to the obligations contained in Reporting of Injuries Diseases and Dangerous Occurrences Regulations (RIDDOR) in the UK.

Depending on the severity of the event, investigations will be undertaken to determine immediate and underlying causes and to identify and implement measures to prevent a recurrence.

## Catering

The Head of Catering ensures that the PGL food safety management system meets current legislation and best practice for catering, partnering with Buckinghamshire Council as Primary Authority, Coeliac UK, and Food Alert. The HACCP plan, any specialist HACCPs and food safety related policies are held within the online safety dashboard. External Audits from Food Alert, Mérieux NutriSciences and Local Authorities provide further feedback and are recorded within the safety dashboard with action tracking.

## Safeguarding

The Safeguarding Board, chaired by The Head of Safeguarding and SEND, is responsible for providing strategic leadership, ownership and oversight of the companies safeguarding policies and procedures and ensuring that safeguarding policies, procedures, and practices remain fit for purpose and sector leading. [The Safeguarding Policy](#) details both the responsibilities and procedures for response to incidents or issues.

## Health and Wellbeing

The Group People and Culture director is responsible for developing an integrated approach to creating and maintaining a healthy workforce, focusing primarily on 3 main areas - protection, promotion, and support.

The General Managers are responsible for the health and safety and wellbeing of their employee teams on Centres and Heads of Department are responsible for their teams at Support Centres. All employees are contractually obliged to be vigilant, raise concerns and work to maintain the health, safety and wellbeing of themselves, their colleagues, and their workplace.

The People and Culture Team will monitor and report on Sickness Absences.

## Transport

PGL's Transport Manager is responsible for contracting suppliers to facilitate all transport requirements. The Transport Manager will audit suppliers and spot check suppliers to ensure legal and contractual compliance.

## First Aid

In line with the [First Aid Policy](#), PGL has made suitable arrangements for the provision of first aid equipment and competent persons across all offices and centres in the UK and overseas based on location specific first aid needs assessments which are reviewed at regular intervals

## Fire Safety

In line with the [Fire Safety Policy](#), PGL has made suitable arrangements to safeguard people and property across all offices and centres in the UK and overseas by way of providing suitable fire safety systems, equipment and procedures. Fire risk assessments are in place at all PGL locations and are reviewed by a competent person at regular intervals to ensure it remains suitable and sufficient.

## Asbestos

In line with the [Asbestos Policy](#), PGL has made suitable arrangements to identify and manage asbestos containing material across all offices and centres in the UK and overseas. Asbestos surveys have been undertaken at each PGL location resulting in an asbestos register where asbestos was identified. Asbestos registers are retained on-site and reviewed at regular intervals.

PGL colleagues are not permitted to undertake any work in areas known to contain asbestos. The PGL Facilities Management Team are responsible for ensuring that suitable systems and procedures to address the management of asbestos within buildings and to ensure competent and licensed contractors are appointed for any required works.

## Water Hygiene (Legionella)

In line with the [Water Hygiene Policy](#), PGL has made suitable arrangements to safeguard people from the risk of legionella across all offices and centres in the UK and overseas by way of providing a suitable water hygiene management regime.

Water risk assessments and suitable written schemes of control are in place at all PGL locations and are reviewed by a competent person at regular intervals to ensure it remains suitable and sufficient.

The PGL Facilities Management Team are responsible for ensuring that suitable and sufficient water risk assessments and written schemes of control are in place at all offices and centres in the UK and overseas.

## Control of Substances Hazardous to Health (COSHH)

In line with the [Control of Substances Hazardous to Health \(COSHH\) Policy](#), PGL has made suitable arrangements to identify and manage risks associated with hazardous substances using appropriate control measures for the safety of PGL colleagues that handle them.





### Display Screen Equipment (DSE)

In line with the [Display Screen Equipment Policy](#), PGL has made suitable arrangements to prevent personal injury to colleagues as a result of using display screen equipment and has provided tools for Managers for workstation assessments to be undertaken with risks managed through the provision of guidance on the safe use of DSE. Additionally and on request, PGL will arrange eye tests and provide corrective glasses where these are required for colleagues to undertake their work.

### Gas Safety

In line with the Gas Safety Regulations and the PGL [Gas Safety Policy](#), PGL has made suitable arrangements to safeguard people from the risk of faulty gas systems across all offices and centres in the UK and overseas by way of ensuring that all appliances and fittings are subject to an annual gas safety inspection by a competent person. The PGL Facilities Management Team are responsible for ensuring that all appliances and fittings are subject to an annual gas safety inspection by a competent person.

### Electrical Safety

In line with the [Electrical Isolations Policy](#), PGL has made suitable arrangements to safeguard people from the risk of injury as a result of working on electrical system whilst not competent to do so. The PGL Facilities Management Team are responsible for ensuring that those working on electrical systems are competent to do so. Additionally, the [Portable Electrical Equipment Policy](#) sets out the arrangements for testing of portable appliances across offices and centres.

### Lone Working

PGL acknowledges that lone working is to be avoided where possible. PGL has developed the [Lone Working Policy](#) and safe working arrangements when there is a need to lone work through risk assessment by Department Managers or a suitably competent person.

### Working at Height

PGL acknowledges that lone working at height is to be avoided where possible. PGL has developed the [Work at Height Policy](#) and safe working arrangements when there is a need to work at height through risk assessment by Department Managers or a suitably competent person. The Facilities Management Team are responsible for ensuring that working at height is managed safely and in-line with the policy.

### Visitors

Through the Visitor Policy and Procedure, PGL has made arrangements to ensure the health, safety security and wellbeing of all guests, colleagues, contractors and visitors and operates a lanyard and badge system to easily identify PGL colleagues, PGL colleagues in training, visitors (vetted) and visitors (non-vetted). Visitors to PGL centres and support centres will be asked to sign-in and will be provided with health and safety information to ensure their safety for the duration of their visit.

### Contractor Management

Through the [Contractor Management Policy](#), PGL has made suitable arrangements to vet all contractors and suppliers, commensurate with the service they provide. All contractors undertaking repair, renovation or construction works at PGL locations have gone through a robust approval process and all works are thoroughly risk assessed and controlled in line with CDM regs. 2015 and PGL management procedure. PGL has made suitable arrangements to ensure that contractors working at PGL locations are managed to ensure they do not put guests, colleagues, visitors, or other contractors at risk through their acts or omissions. Through the [Hot Works Policy](#), PGL has made suitable arrangements to ensure that contractors undertaking hot works at PGL locations are managed to ensure they do not put guests, colleagues, visitors, or other contractors at risk through their acts or omissions.

### Workplace Equipment

PGL has developed the [Workplace Equipment Policy](#) to ensure that equipment used in all Departments at PGL locations is fit for purpose and suitably maintained.

### Personal Protective Equipment (PPE)

In order to ensure the health, safety and wellbeing of guests and colleagues, PGL provides colleagues with personal protective equipment (PPE) appropriate to the task being undertaken and as determined by risk assessment, safe systems of work and normal operating procedures. Colleagues are responsible for ensuring that correct PPE is worn at all times as determined through risk assessment, safe systems of work and normal operating procedures.

### Audit and Inspection

#### Active Workplace Monitoring

Active monitoring of activity delivery is undertaken at regular intervals in line with the [Active Workplace Monitoring Policy](#) to ensure appropriate levels of safety and compliance.

#### Workplace Safety Audits

Active monitoring of other departments is undertaken through workplace safety audits being undertaken at regular intervals.

#### Internal Audit

Internal audits of all PGL Centres are undertaken at regular intervals by the Audit and Compliance Team in line with the [Audit Policy](#).

#### Technical Compliance Audits

Technical compliance audits are undertaken at regular intervals by the Facilities Management Team or their designated competent person. Results of audits are shared with relevant Departments and discussed at the Health and Safety Committee.







**Safety Tours**

Tours of all PGL centres are undertaken at regular intervals by Regional Operations Managers to ensure that standards of safety and compliance are being met and recommended remedial actions from previous audits and inspections have been mitigated or addressed in line with the agreed corrective action plans.

**External Audit**

PGL centres are subject to inspection by the following external organisations and regulatory bodies at regular intervals:

- Adventure Activities Licensing Authority
- British Activity Providers Association (Adventuremark and LOTC Awarding Body)
- British Canoeing
- Royal Yachting Association

Specific visits to ensure general health and safety compliance along with specialist inspections and audits of technical maintenance categories.

**Corrective Actions**

PGL is committed to ensuring that corrective actions from audits, inspections, assessments are addressed in a timely manner.

**Communications**

PGL is committed to communicating in an effective manner in all areas of the business. In terms of health and safety, PGL has deployed the following means of communication:

**Board Meetings**

Health and safety is a standing agenda items at Board meetings where the monthly operational health and safety report is discussed.

**Health and Safety Committee**

A business-wide group with a purpose to provide governance in the way health and safety is managed in all brands within PGL. Additionally, the group provides opportunity for colleagues to be consulted on matters which may affect their health, safety and wellbeing.

**Centre Health and Safety Meetings**

Chaired by a member of the Centre management team, health and safety meetings are held at each PGL Centre on a monthly basis and provide the opportunity to discuss departmental safety standards and cascade information from Group level. Additionally, centre health and safety meetings provide an opportunity for colleagues to raise health and safety concerns for escalation to the Health and Safety Committee.

**Support Centre Team Briefings**

Produced by the Board and distributed quarterly, the support centre team brief includes health and safety matters for consideration.

**Team Meetings**

PGL aims to ensure that health and safety is discussed at every team meeting across all PGL businesses by way of it being a standing agenda item.

**Safety Notices**

Issued when immediate action is required such as following a serious accident, equipment failure, significant changes in legislation or policy changes, safety notices are issued to relevant parts of the business as required.

**Newsletters**

Issued at regular intervals and providing general information about health and safety developments, news, relevant prosecutions, safety newsletters are issued to all PGL businesses.

**Operations Bulletins**

Health and safety matters are also communicated via regularly issued operational bulletins.

**Enforcement Action**

PGL will fully co-operate with enforcement agencies during both announced and unannounced visits to all offices and centres in the UK and overseas. Details of any contact from enforcement agencies, improvement notices, enforcement action, notice of announced visits or outputs from unannounced visits will be recorded by the PGL centre/support centre followed by a report of the contact to the Safety and Compliance Director at the earliest opportunity and within 24hrs of the contact.

**Review**

This policy will be reviewed at regular intervals and at least annually.

