

# **Health and Safety Policy**

## Part 1

### Health and Safety Policy Statement

## Part 2

### Details of the Organisation

## Part 3

### Arrangements for Implementation

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**END**

## **1 Health and Safety Policy Statement**

SKILLS CONSULTANTS recognises its responsibility to provide a safe and healthy workplace for all its employees, learners, apprentices, apprentice employers, contractors and visitors, and that complying with the Health and Safety at Work Act 1974, and regulations made under it, is a legal requirement.

Our policy is to exceed the minimum requirements of the law where possible and to do this we will provide sufficient resources to meet this commitment. We will also ensure that systems are in place which will allow us to maintain, monitor and, where necessary, improve safety performance. Included in these systems will be means to allow communication and consultation on Health and Safety matters between everyone who works at SKILLS CONSULTANTS.

In return, we expect employees at all levels to exceed their minimum legal duties, which are given in the organisational responsibilities section. This includes co-operating with us on safety matters and taking care of their own safety and that of others who may be affected by their actions.

Any information, instruction, training or supervision necessary to meet these commitments will be provided to those who require it in order to perform their job safely.

The policy and the way it has operated will be reviewed at least annually and more often if SKILLS CONSULTANTS changes in nature or size. Any revision necessary to improve safety performance will be made and reported to employees.

## 2 Organisation

This section of the policy describes how the management of Health and Safety is organised throughout SKILLS CONSULTANTS.

Although it is everyone's responsibility to ensure their own safety and the safety of others while they are at work, specific responsibilities for Health and Safety have been given to individuals who hold certain job roles within the organisation.

### Management Structure for Health and Safety

Brett Garrick – Director

John Leslie – Business Services Manager

The Health and Safety Lead (Brett Garrick) has overall responsibility for Health and Safety at SKILLS CONSULTANTS.

### Responsibilities

#### Policy Making

The senior management team have ultimate responsibility for Health and Safety at SKILLS CONSULTANTS.

The Director has the responsibility for organising the Health and Safety policy arrangements.

#### Implementing Policy

The Director and Business Services Manager have overall responsibility for the overall implementation of the policy and procedures and the day to day running.

Staff are responsible for their own safety and that of their colleagues and must adhere to the procedures and directive issued. A wider description of responsibilities is given in the following paragraphs:

The Director will:

#### Health and Safety role

1. Ensure that SKILLS CONSULTANTS policy and procedures continue to meet the requirements of current Health and Safety legislation.

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2. Update or produce new procedures as necessary.
3. Review the policy and procedures regularly or if conditions change.
4. Audit all aspects of the implementation of the policy and procedures throughout the company to ensure continued compliance with legislation.
5. Design and implement the management system for Health and Safety throughout the company and maintain its effective operation.
6. Record all information relating to accidents, incidents, near misses, staff training, evacuation drills and other safety inspections or records necessary to comply with company policy, procedures, and the law.
7. Act on behalf of SKILLS CONSULTANTS with external organisations e.g. The Health and Safety Executive, the Local Authority, and associated stakeholders.
8. Health and Safety reported and discussed monthly at SMT meeting.
9. Liaise with, instruct, and generally advise staff, learners and apprentices on matters of Health and Safety.
10. Investigate all reportable accidents, to identify the causation factors and review and revise procedures to reduce the risk of a recurrence. Compile and file all reports for such accidents with the appropriate authority (RIDDOR 2013) and any stakeholders who may require the same. Ensuring that effective local arrangements are in place for implementation of Health and Safety policies, procedures and codes of practice.
11. Promoting a positive Health and Safety culture by, for example, ensuring effective communication of Health and Safety information and including safety as an agenda item at all management meetings.
12. Training staff to comply with the Health and Safety Policy and procedures and assist in the effective management of Health and Safety and in particular to undertake risk assessments.
13. Reviewing and updating risk assessments and submitting them to relevant staff for approval.
14. Inspecting the areas to ensure that equipment, storage of combustible materials, and the condition of the workplace and traffic routes is maintained safely.
15. Ensuring that where necessary and when identified to reduce risk that personal protective equipment is available, sufficient, and suitably supplied and maintained to those who might need it.
16. Ensuring that appropriate induction training is provided for all staff, apprentices, learners, employers, visitors and contractors.

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17. Ensuring that all accidents and incidents are recorded and examined and that all reasonable steps are taken where possible to prevent a similar occurrence.
18. Ensuring that materials, consumables, and equipment purchased for use at SKILLS CONSULTANTS are recorded, evaluated and assessed to reduce any risk from hazards they may present.
19. Ensuring that there is proper coordination, cooperation, and communication with other users of shared and/or adjacent space.
20. Suspending activities where Health and Safety is being, or is likely to be, compromised or the environment damaged.
21. Taking appropriate disciplinary action where staff, apprentices or learners have breached the SKILLS CONSULTANTS's Health and Safety Policies and Procedures.
22. Ensuring that arrangements are in place for the regular monitoring, auditing and review of Health and Safety performance.
23. Being available to any member of staff, Trade Union Safety Representative, apprentice, learner or employer to discuss or resolve Health and Safety matters.
24. Ensuring that adequate resources are allocated to mitigate Health and Safety risks.
25. Maintain a register of trained First Aiders and Fire Marshalls to ensure areas are sufficiently covered in the event of any incident or emergency.
26. Organise and implement Evacuation Drills at a frequency as set out in relevant procedures and test fire alarms and maintain the fire-log record.
27. Take action to minimise any risk from deficiencies, faults or breakages of equipment, fixtures or fittings.

## Facilities

The Director is responsible for Health and Safety matters relating to the training centre.

This will include:

1. Heating and ventilation equipment.
2. Hot and cold-water systems.
3. Fixed wiring, lighting and portable appliance testing and certification.

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4. Firefighting equipment, signage, and escape routes.
5. General maintenance of buildings and contents to maintain a safe working environment.
6. Ensuring that contractors working on the premises submit method statements and risk assessments to reduce all risks to themselves and the staff, apprentices, learners and visitors.
7. Arrange to instruct, inform, and train the staff so that they can effectively assess and safely carry out the necessary work to inspect, repair and maintain premises.
8. Manage staff communication to ensure that breakdowns or request repairs or assistance is provided and monitored.
9. Manage the conduct and safety of all contractors working on premises and ensure that they are given a safety induction and that risk assessments and method statements are adhered to and that any permits for working high risk areas are in place.
10. Ensure that all premises remain safe for staff, apprentices, learners and visitors.

### **All Staff**

All staff have responsibility for ensuring that all colleagues within their control are aware of their duties and responsibilities to one another and to apprentices, learners and visitors to SKILLS CONSULTANTS and that staff adhere to the procedures set out in the management system for Health and Safety.

They must ensure that fire-fighting equipment, storage of combustible materials, lighting and the condition of the workplace and traffic routes is maintained safely throughout the areas within their control.

They should report any incident or breach of conduct and actively seek to redress any shortfalls by bringing them to the notice of the Managing Director

In particular they should:

- Understand the organisation and arrangements for Health and Safety at SKILLS CONSULTANTS.
- Be aware of their responsibilities for Health and Safety.
- Know of and comply with statutory requirements and appropriate codes of practice relevant to their role.
- Organise and implement the delivery of any necessary information, instruction, training and supervision to ensure the Health and Safety of those affected by what they themselves do or

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by what they ask others to do, including apprentices, learners and employers.

- Set a high standard of safety by personal example so that staff, apprentices, learners and employers at SKILLS CONSULTANTS and come to accept good safety practice as normal.
- Seek assistance from senior managers to resolve matters of Health and Safety beyond their experience or control.
- Take action to minimise any risk from deficiencies, faults or breakages of equipment, fixtures or fittings and promptly report them to the Managing Director or Head of Centre for repair or replacement.
- Immediately stop any actions, or practices within their areas that in their opinion are unsafe.
- Report to the Director or Business Services Manager any situation or condition that may compromise safety.
- Co-operations in auditing processes at the request by senior managers.

Section 7 of the Health and Safety at Work Act 1974 places a duty on all employees while at work to take reasonable care for themselves and of anyone who may be affected by their acts of omissions. They also have a duty to co-operate with SKILLS CONSULTANTS in order that it can comply with its own duties under the Act and associated legislation.

Section 8 requires that no one shall interfere with or misuse anything provided by SKILLS CONSULTANTS in the interests of Health and Safety (e.g., fire alarms, extinguishers, first aid boxes).

Staff should report to Director or Business Services Manager any accidents, unsafe circumstances, or work-related ill health of which they become aware.

Where a member of staff is not confident that he or she is competent to carry out a work activity safely, his or her line manager should be informed and rather than compromising his or her own safety or the safety of others the staff member should not proceed with the activity.

### **H&S expectations from staff related to learners**

All staff have a duty to take reasonable care of their own Health and Safety and that of all other staff, apprentices, learners, apprentice employers and visitors that may be affected by their teaching and other work-related activities, they must ensure that:

- Safe systems of work are taught to apprentices and learners.
- Sufficient information, instruction and training is given to all apprentices, learners, and employers to enable them to work safely and provide a safe and suitable working environment for apprentices.
- Equipment and substances are used in a manner which will not adversely affect their Health

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and Safety and that of apprentices, learners, or other staff.

- They understand all company procedures that govern Health and Safety of their area of delivery, particularly relating to emergency evacuation and accident procedure.
- Sufficient information, instruction, induction and training for apprentices, learners, and employers to enable them to work safely, particularly during work, training, and demonstrations.
- Instructions on the use of equipment and substances in a manner which will not adversely affect their Health and Safety and that of apprentices, learners, or other staff, when required for course work, research and consultancy undertaken by SKILLS CONSULTANTS.

### **3. Arrangements**

The purpose of this section is to identify and outline what practical arrangements are in place for ensuring safe working practices that allow the aims of the general policy statement to be realised.

#### **Accidents, Incidents, Ill Health and Injury Reporting**

A procedure is in place for the recording and reporting of accidents which also describes the arrangements in respect of the reporting of diseases and dangerous occurrences (RIDDOR) which may occur at SKILLS CONSULTANTS. Other reporting is undertaken, when requested, to stakeholders associated with SKILLS CONSULTANTS.

#### **First Aid**

Skills consultants has a number of trained First Aiders on site. This is to ensure Health and Safety is maintained in training centre. A comprehensive health and safety vetting form is completed with all apprentice employers to ensure the safety of learners when on-site with their employer/mentor.

In the event staff are not able to treat the accident, injury or illness, the emergency services must be called and when it is safe and practical to do so alert a Director / Business Services Manager who can also assist with contacting the emergency services.

In the event of an accident away from the office a mobile phone should be used to call the emergency services and notification to the office of the accident as soon as it is practical to do so.

#### **First aid equipment**

- First Aid equipment and supplies must be stored safely in the training space.
- Names of holders of first aid certificates are displayed in the training space.
- Injuries to anyone in the workplace must only be treated by someone holding a current First Aid certificate.
- All injuries must be recorded.
- Injuries to staff must be recorded by someone other than the member of staff who is injured.

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- Equipment for dealing with cleaning up vomit or other body fluid is provided.

### **Procedures to be followed if an accident or Sudden Illness occurs**

#### **Employees need to:**

- Take any action required to deal with the immediate risk.
- Contact the emergency services if necessary.
- Contact a senior manager and make them aware of the situation.
- Ensure the incident is properly recorded in accident book.

### **Reporting an accident in the workplace or Training Environment**

SKILLS CONSULTANTS requires staff, apprentices, learners, and employers to report accidents so that SKILLS CONSULTANTS can thoroughly investigate the matter and take steps to prevent them from recurring in the future. There are various types of workplace accidents that must be reported, and these include deaths, major injuries, injuries that require an employee, apprentice or learner to miss work for more than a seven-day period, work-related diseases, dangerous occurrences, and incidents where a member of the public is taken directly to hospital for treatment.

#### **If an Accident or Incident Occurs at the centre, the Director will need to:**

- Assess the kind of investigation needed.
- Report the incident as required to the enforcing authorities.
- Investigate (what happened and why?)
- Take action to stop something similar happening again.

An Accident/Incident Report Form must be completed and details pertaining to the accident recorded. An entry should be made in the accident book as soon as possible after the accident/incident but in an event no later than the end of the day.

The accident book is kept in the main office, and is analysed regularly at SMT meetings to identify any patterns, so that appropriate action can be taken to make the situation safe again.

#### **Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (updated in 2013) RIDDOR**

These regulations place responsibility on employers to report accidents at work (dangerous occurrences) and diseases to the Health and Safety Executive including those which may be infectious or contagious and those which may develop because of work (industrial/occupational diseases). Employers can be fined if they fail to report them.

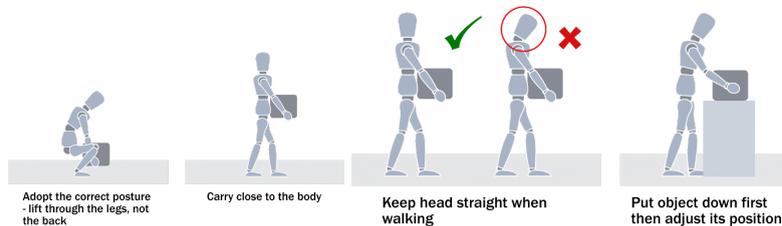
- If someone is off work or not able to do their usual work tasks (whether an employee or self-employed) for over seven consecutive days after an injury, then it must be reported within 15 days of the accident taking place.
- Accidents must be recorded, but do not need to be reported where a worker is unable to work for three or fewer consecutive days.
- Accidents which do not result in death must be reported if they result in an injury and the person is immediately taken to hospital.
- All deaths in workplace must be reported.

All accidents, dangerous occurrences, and hazardous conditions must be brought to the attention of a senior manager.

The Director will ensure that all accidents and dangerous occurrences are recorded in the company accident book and are appropriately investigated with the aim of preventing re-occurrence. They are also responsible for reporting any qualifying accidents, diseases, and dangerous occurrence to the enforcing body.

## Manual handling

- Lifting incorrectly can cause injury.
- Staff must ensure that they only lift or move heavy or bulky objects after proper consideration.
- Study the manual handling guidelines and seek advice if unsure.
- Seek help if necessary.
- Special care should be taken when lifting from the floor, or from above shoulder height.



## Visitors

Visitors are always the responsibility of their hosts and must be made aware of any relevant company procedures. All visitors are expected to sign in to the centre and adhere to our Covid procedure. Information regarding fire drills will be provided.

## Contractor and Subcontractors

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All contractors / subcontractors working on site will be required to comply with all relevant company procedures and provide evidence of their competence and compliance with health and safety matters.

### **Fire and Other Emergencies**

Alarm systems are checked regularly and fire evacuation drills held at a frequency determined by a relevant procedure. Effective fire alarm and extinguishing systems are regularly maintained.

Any deficiency found when checks on the fire detection, fire alarm or fire fighting systems and equipment are undertaken are recorded and immediately reported to the Director.

### **Evacuation Procedures**

Each day an evacuation marshal will be present on site. In the event of an emergency that requires evacuation, such as fire, smoke, intruders in the building or bomb threat, the alarm must be triggered, and all staff, apprentices, learners and visitors must evacuate via the nearest exit, which are clearly marked. If safe to do so the marshal is responsible for checking that all areas are clear and collecting the signing in book. The assembly point is on the grassy knoll at the junction of Elm Rd and Larch Court. The increased distance for evacuation is in place and takes into consideration the nature of the training centre's contents. The evacuation marshal will check that all are present and accounted for. All staff are responsible for telephoning the emergency services.

If training is being delivered at other premises away from the main site, in an event of an emergency the delivery staff, apprentices, learners and visitors must follow the evacuation procedures for that setting.

No one may re-enter the building until the emergency services have said that it is safe to do so.

### **Security**

- Do not let anyone into the workplace who is not known to you. Refer unknown callers to a senior member of staff who will check their identity and issue a visitor's badge if appropriate.
- Staff should try not to visit the workplace out of hours without first advising a Director.
- Always ensure that the front door is locked whenever you are alone in the building.
- If you see anyone in the building or training area who is not known to you and who is not wearing an official visitor's badge, you should politely challenge them and establish their identity. They may need to be escorted to a senior member of staff for a badge.
- Staff should not bring valuables or large amounts of cash to work. If this is essential, arrange for it to be locked in a secure place.
- A senior member of staff should be advised if anyone is observed loitering or acting suspiciously in or close to workplace premises.
- CCTV is in operation throughout the premises.

### **Security Incidents**

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In the event of a security threat all staff, apprentices, learners and visitors must make their way to a central point in the building and wherever possible stay away from windows and doors. Wherever possible all windows must be secured. SKILLS CONSULTANTS adopts the governments Run Hide Tell procedure. All are responsible for telephoning the emergency services to report the incident.

## **Lone Working**

Office staff may be required to spend periods of time alone in the office. Staff may be required to spend time alone working in training locations or travelling to workplaces.

In these events, staff should take all necessary precautions to keep themselves safe including:

1. Locking all doors and windows - being mindful of an emergency escape route in case of fire etc.
2. Having all appropriate emergency contact numbers and a telephone to hand.
3. If walking alone, to or from a vehicle, ensuring that the vehicle is parked in a well-lit area that is as close as possible.

SKILLS CONSULTANTS in turn will participate by:

1. Minimising the occurrence of lone working
2. Providing panic alarms for general use if desired.

Mobile employees are expected to keep regular contact by phone with the head office / local office and must be contactable during working hours.

If an employee knows they will not be contactable for a period, such as their being no signal on their mobile phone, as a result of working in an isolated area, they should pre-warn the office of the expected duration of this and if any necessary special arrangement should be made. These may include utilising the client's land telephone line.

Employees should also always advise on-site staff of their whereabouts, particularly when meeting new clients.

## **Staff, Apprentices and Learners Using Public Transport**

When using public transport staff, apprentices and learners will be advised: to be aware of the people around their environment. If at any time you do not feel safe, leave the area, and find somewhere safe to contact head office. Please ensure that you have planned your journey, keep to populated and well-lit areas. If you must wait for buses or trains wait in lit areas and where possible with others so that you are not on your own. Please ensure that your fares are ready and that you are not trying to find cash whilst waiting as this could make you vulnerable. Please keep all your possessions hidden and carefully stored so as not to draw attention to yourself. If you must use your mobile phone keep this close with a firm grip and find a secure place to use it. Again, please be aware of the environment and the people around you.

When walking please keep to lit areas and plan your route before starting your journey. If you are using your car, please ensure that you park in well-lit areas of a car park or on street areas. Be aware

of your environment when getting out of the car or returning to it. Think about your personal belongings when getting in or out of the car.

## **Risk Assessments**

SKILLS CONSULTANTS examines all aspects of its activities involving staff, apprentices, learners, employers and visitors to establish what hazards exist and to evaluate the risks presented by them. When significant risks are identified, actions are taken to reduce these risks to the lowest level practicable. Current Covid Risk Assessments are available in all learner virtual classrooms, with any significant changes or updates shared with employers.

Information about risk reduction is published in the form of risk assessment and control measures these are recorded and controlled by the Director.

## **Hazard Substances and Dangerous Equipment**

All substances used at SKILLS CONSULTANTS are subject to hazard identification and subsequent risk assessment with the objective of reducing risk to the lowest level reasonably practicable.

Safe storage, handling, transport, and disposal are included in these assessments.

Dangerous equipment is either enclosed, its use is restricted to specific individuals who have been trained and are deemed competent to use it or contained in a secure area.

## **Training for Staff, Apprentices, Learners and Workplace Employers**

All staff, apprentices, learners, and employers are given Health and Safety induction training. Existing staff are also subject to refreshers on modules identified as relevant to their roles annually. During this training and inductions for all, the Health and Safety Policy and Procedures of SKILLS CONSULTANTS are explained and reviewed, including:

- Roles and responsibilities
- Reporting Health and Safety risk, issues, or concerns, including those in the apprentice or learner's place of work.
- First Aid and accident procedures and reporting
- Reporting broken or faulty equipment
- Maintaining and ensuring Health and Safety in the workplace

All staff, apprentices, learners, and employers are given access to the Health and Safety policy and procedures. All training is recorded either in the induction record or on individual CPD records. If specialist training is required or requested by individual staff members, apprentices, learners, or employers these will be assessed by the Director or Business Services Manager and appropriate training will be sourced.

All SKILLS CONSULTANTS meetings will include Health and Safety as a part of the agenda to reinforce the policy and procedure and ensure that any emerging risks are identified and controlled or removed.

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During apprentice and learner progress reviews, the welfare and health and safety of the apprentice and learner will be discussed, and advice and guidance may be given to support knowledge and understanding, and issues must be reported to the employer and the Director at SKILLS CONSULTANTS. This is to ensure that any Health and Safety issues can be investigated and rectified to ensure continued commitment to safeguarding apprentices, learners, staff and stakeholders.

### **Apprentice and Learner Places of Employment**

All apprentice or learner workplaces will be subject to a Health and Safety risk assessment conducted by trained delivery staff, which will be conducted prior to commencement of the course or apprenticeship. The risk assessment may identify actions that the employer must take to ensure the safety of the apprentice or learner. These will be risk rated and a timely date set to ensure that the action has been completed. This will be reviewed and reassessed by a delivery staff member to ensure compliance. Red risk ratings will result in a delay in the apprenticeship or learner start date and will need to be remedied before commencement of the apprenticeship or programme.

If the place of employment is still deemed unsafe by the review date, then the apprentice or learner will be advised of the risks to their safety and informed that they cannot commence their training at this place of work. IAG will be provided to support an apprentice or learner to find an alternative safe place of work to commence training, however, wherever possible, SKILLS CONSULTANTS will support the employer to remedy any risks to Health and Safety to ensure the place of work is safe to commence training.

The risk assessment will be formally reviewed every 6 months, however, when delivery staff visit the place of work, they must pay due care to Health and Safety requirements and report any concerns to the employer at the workplace and the Managing Director at SKILLS CONSULTANTS. If the visiting delivery staff have immediate concerns, they must notify the workplace manager, ensure that safety of the apprentice or learner and leave the premises. This includes informing the apprentice or learner to also leave the premises if it is unsafe to remain. In this instance, the Managing Director must be contacted immediately and may be required to pass on Health and Safety concerns to the relevant inspectorate for SKILLS CONSULTANTS and the workplace.

During apprentice and learner progress reviews, the welfare and health and safety of the apprentice and learner will be discussed, and issues must be reported to the employer and the Managing Director at SKILLS CONSULTANTS to ensure that any issues can be investigated and rectified to ensure continued commitment to safeguard apprentices, learners, staff, and stakeholders.

### **Inspections and Audits**

The Health and Safety Officer must carry out inspections and audits of the areas under their control to confirm that actions and procedures for Health and Safety are maintained. The purpose of these audits and inspections is to monitor the effectiveness of the management systems and to identify any shortfalls so that procedures can be revised, and continuing improvements can be made.

### **Covid-19 Precautions**

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Please refer to the Covid-19 risk assessment for processes, procedures and precautions that will be executed during the pandemic and will be reviewed monthly and in line with government guidance and changes to the local and national pandemic status.

### **Aim of the Policy**

To ensure that the risks of COVID-19 presented to apprentices, learners, staff and visitors are kept at a minimum level.

### **Policy objectives**

- To conduct all activities safely and in accordance with government legislation.
- To provide a safe environment for all.
- To ensure a methodical approach to the identification of risks and the allocation of resources to control them.
- To be open on all communication in regard to health, safety and welfare.

### **Policy Statement**

SKILLS CONSULTANTS recognises and accepts full responsibility as an employer and provider of services and will provide a safe and healthy workplace and learning environment for all staff, apprentices, learners and visitors.

We will adopt health and safety arrangements under COVID-19 in line with Health and safety legislation and in consideration of government guidelines.

Good Health and safety management will be an integral part of the way in which the business operates and will be considered across all work activities.

### **SKILLS CONSULTANTS will:**

Apply and communicate sensible risk management and safe working practices, these will include:

- Regular assessment of hazards and associated risks.
- Implementing preventative and protective control measures against those risks to an acceptable level.
- Monitoring of the effectiveness of these measures to be carried out by the Managing Director and senior leaders.
- Provision of information, instruction, training, and protective equipment to all staff.
- Review of risk assessments, policies, procedures, and practices at regular intervals and when additional information is provided by government changes.
- Implement measures to ensure social distancing is observed across the site and in all other buildings.
- Maintain an appropriate hygiene and cleaning regime to be followed by all for the duration of COVID-19.
- Ensure that staff are informed, trained and instructed to ensure competence and awareness of Health & Safety precautions required during COVID-19.
- To educate staff, apprentices, learners and employers about COVID-19 and encourage and re-assure them about the measures in place to protect everyone.
- Communicate regularly and effectively with staff, apprentices and learners about the business's response to COVID-19.
- Put in place any flexible working arrangements needed to support staff during COVID-19 including home working, flexible start, and end times.
- Put in place measures to check on staff, apprentice and learner well-being.

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- Draw up contingency plans for – Someone falling ill or demonstrating symptoms on site and the deep cleaning of the business in the event of an outbreak of COVID-19 on site.
- Provide appropriate PPE as required to all staff.

**Staff must take personal responsibility to ensure that they have fully read and adhere to the following to protect their own health and safety and update their knowledge.**

- The most up to date copy of the SKILLS CONSULTANTS Covid-19 risk assessment – this is available to all staff and will be communicated out to apprentices, learners and employers.
- Complete a COVID-19 related training resource inclusive of infection control.
- Health and Safety policy.