

Compliance Assurance Report

Safety-Counts Ltd

Address: Flexspace, Unit 41, Western Industrial Estate, Caerphilly, CF83 1BE

Date of Assurance Visit: 17th – 18th August 2022

NSAR Assurance Manager: Liz Emery

Effectiveness of the provider:

Previous Assurance Visit Compliance Grade: Bronze

Previous Assurance Visit Premises Grade : Silver

This Assurance Visit:

Compliance [Leadership & Management]: Gold

Premises [Quality of Provision]: Silver

DESCRIPTION OF THE SETTING

Safety-Counts Limited have been an assured provider since 2019. This was the second compliance visit to this provider and the first report under the fourth version of the Quality Assurance Framework.

Safety-Counts Limited is an independent training company who deliver track safety training and assessments to the rail industry. The provider also offers NPTC courses as well as training in health and safety such as First Aid at Work, Manual Handling and Fire Safety.

The providers' facilities are within a managed services building in Caerphilly in South Wales. The two large, fully equipped classrooms, main office, breakout areas and a small practical training area are fully compliant to the current standard. Safety-Counts do not own any of their own Practical Training Sites, but are approved to use three sites owned by others in South Wales for Track Induction and On-Track Plant.

The venue has good transport links, based six miles off junction 32 of the M4 and Aber train station is a fifteen-minute walk from the venue with regular trains to Cardiff.

LEADERSHIP & MANAGEMENT COMPLIANCE **GRADE: Gold**

1. GENERAL

POLICIES & PROCEDURES			
Operational Policies & Procedures	COMPLIANT	RISQS Certification	COMPLIANT
RTAS Specific Procedures	AFI IDENTIFIED	Sentinel Scheme Rule Adherence	COMPLIANT
Organisation Structure	COMPLIANT		
FINDINGS			
<p>Safety-Counts Limited [Safety-Counts] has the required documented management systems in place for their operational policies and procedures. These are in the form of a Rail Procedure Manual that has been designed specifically to align with RTAS V2.1. The Rail Procedure Manual shows that the provider understands the requirements of the RTAS scheme. However, there are a small number of good practices that Safety-Counts complete on a daily basis that are not detailed in the manual such as their approach to Workplace Assessments and pre-course planning. . It is recommended that these are added to formalise the good practice identified during the assurance visit.</p> <p>The provider has a documented organisational structure in place, that covers the various roles within the company and clearly states the deputies for each role. However, there is no reference to the Internal Quality Assurer [IQA] on the organisational chart. This job role and its deputy need to be added to the structure as highlighted in the areas of improvement below. All employees have been through a detailed induction process, have a signed job description and evidence clear understanding of the roles and responsibilities they each have in the team.</p> <p>Safety-Counts holds the required RISQ certification and the relevant product codes to operate as an Assured Provider. They adhere to the Sentinel Scheme Rules and have appropriate procedures in place to monitor their responsibilities as a Primary Sponsor.</p>			
POSITIVE FACTORS	✓	The Rail Procedure Manual is a well constructed document which shows a excellent understanding of the RTAS Rules.	
AREAS FOR IMPROVEMENT (AFI)	➤	Update the Rail Procedure Manual with areas highlighted throughout this report and on the visit action plan.	
	➤	Update the organisational structure to include the Internal Quality Assurer job role.	
NON-CONFORMANCES	•	N/A	

TRAINER, ASSESSOR & VERIFICATION ASSURANCE

COMPETENCY MANAGEMENT			
Procedure Present/Available	COMPLIANT	Non-Operational Staff	COMPLIANT
Compliant With RTAS	AFI IDENTIFIED	Online Exams	COMPLIANT
Assured Individuals Competence	COMPLIANT	Observations	COMPLIANT
Workplace Assessments	AFI IDENTIFIED	CPD	COMPLIANT
FINDINGS			
<p>Safety-Counts Ltd has procedures in place that meet the requirements of RTAS V2.1 for the competency of its Training and Assessors. The Providers Competence Management System includes a templated form which is manually filled out every month by one of the company's Directors. The form covers Sentinel competences, core exams, medicals, CPD, observations, workplace assessment and First Aid competences. This is displayed in the main office for all team members to see and is used during their quarterly performance reviews and yearly appraisals.</p> <p>All individuals in Assured Positions hold the correct qualifications and capabilities to conduct their role. All active assessors have undertaken the required number of work place assessments in line with RTAS V2.1 requirements. The section detailing the volume of work place assessments required by RTAS in the Rail Procedure Manual requires minor amendments to fully reflect the good practice that the provider undertakes. Currently the provider exceeds requirements and have strong administrative systems in place to make sure all RTAS obligations are met.</p> <p>The provider has a mixture of operational and non-operational trainers and assessors. They manage their competences and on-line exam requirements effectively and have detailed processes within the Rail Procedure Manual to consistently meet the minimum requirements. All Online exams are completed on time.</p> <p>Peer-on-peer observations are completed regularly on all Trainers and Assessors within the center. These observations are scheduled and documented within the providers Competence Management System and discussed during the quarterly performance reviews. By continually monitoring the observations the provider makes sure that the correct number of observations as required by RTAS V2.1 is met consistently. The completed observations are then uploaded onto the Skills Backbone, which is excellent practice.</p> <p>Safety-Counts has a proactive approach to Continuous Professional Development [CPD] with a good use of mid-term reviews. They actively encourage a wide range of activities that assist with strategic direction of the Provider along with individuals personal and professional development. Trainers and Assessors are supported by senior management with their CPD and it is a standard item for discussion during one to ones, appraisals and monthly meetings.</p>			

POSITIVE FACTORS	✓	In depth Competence Management System that covers all areas of Assured Individuals competences.
	✓	Good CPD practices shown, with strong leadership from senior management.
AREAS FOR IMPROVEMENT (AFI)	➤	The Rail Procedure Manual requires updating to include the good practice completed for six work place assessments.
NON-CONFORMANCES	•	N/A

QUALIFICATION LEVEL	3	4	5	5+
Number of Assured Trainer/Assessors	1	1	1	1
Trainer/Assessors working towards	0	0	0	0

INTERNAL QUALITY ASSURANCE			
Procedure Present/Available	COMPLIANT	Verifier Competence	COMPLIANT
Compliant With RTAS	COMPLIANT	Process Requirements	COMPLIANT
FINDINGS			
<p>Safety-Counts has a valid and appropriate internal verification procedure that covers its Internal Quality Assurance [IQA] processes and it is compliant with RTAS V2.1. The procedure explains that all training and assessment events are subject to 100% risk based internal quality assurance checks.</p> <p>The provider currently has three qualified IQA's who are also the Trainers and Assessors. The provider has taken this approach to maximise the benefit of standardisation between Trainers/Assessors and is highly effective.</p> <p>The IQA process is thorough. The verifier uses a checklist which creates a standardised approach when verifying. These checklists make sure that all the completed paperwork is in line with RTAS V2.1 requirements. Both positive and constructive feedback is written on the IQA checklist before being given verbally to the Trainer/Assessor in a 1:1 meeting. Both the Internal Verifier [IV] and Trainer/Assessor agree and sign the form. This checklist is then retained within the course packs and discussed in team meetings if required.</p>			
POSITIVE FACTORS	✓	N/A	
AREAS FOR IMPROVEMENT (AFI)	➤	N/A	
NON-CONFORMANCES	•	N/A	

RTAS ASSURANCE ARRANGEMENTS

ASSURANCE VISITS			
Procedure Present/Available	COMPLIANT	Visit Preparedness	COMPLIANT
Compliant With RTAS	AFI IDENTIFIED	Action Plan Completion	COMPLIANT
Annual Review / SBB	AFI IDENTIFIED		
FINDINGS			
<p>The provider has a documented process in place within the Rail Procedures Manual for the acceptance and completion of NSAR assurance visits. This section within the manual requires some expansion to include reference to deputies to Training Manager and Assurance Visits , as detailed below.</p> <p>Safety-Counts consistently submitted their annual reviews before the deadline, and in line with the RTAS V2.1 requirements. Although updated in time the superseded documents submitted along with the annual review have not been removed. This means that there are multiple copies of the same document uploaded onto Skills Backbone. An area for improvement is recommended to remove superseded documents throughout the year making sure only current versions are held under each annual review.</p> <p>Safety-Counts were well prepared for the assurance visit, with all the requested documents provided promptly. All event packs requested for external verification were made available upon arrival and within the 24-hour requirements. All documents and event packs were presented in a highly organised manner, which reflects the hard work and standardisation that the Safety-Counts team put into all stages of the Training and Assessment process.</p> <p>The provider has a documented process for the close out of action plans which have been generated by compliance assurance visits. Actions from previous compliance visits have been closed out and implemented effectively and implemented quickly by Safety-Counts.</p>			
POSITIVE FACTORS	✓	Prepared and organised for the visit whilst being helpful throughout.	
AREAS FOR IMPROVEMENT (AFI)	➤	Update procedure to include reference to deputy arrangements for assurance visits in the absence of the Training Manager.	
	➤	Keep the annual review and its corresponding documents current, removing superseded versions on Skills Backbone.	
NON-CONFORMANCES	•	N/A	

ROLES & RESPONSIBILITIES

PROVIDER			
Procedure Present/Available	COMPLIANT	Meetings/Briefings	AFI IDENTIFIED
Compliant With RTAS	AFI IDENTIFIED	Skills Fade	COMPLIANT
Toolkit Management	AFI IDENTIFIED	Additional Support	COMPLIANT
FINDINGS			
<p>The providers Rail Procedures Manual clearly states the roles and responsibilities of Safety-Counts and those that hold Assured Positions. The manual is specific to RTAS V2.1, however there are limited areas (referenced below) that need to be included to make the procedures reflect the excellent practices undertaken.</p> <p>The Rail Procedures Manual documents the process for the use of, and the management of, the Training Toolkit. Secure process to manage logins was demonstrated by the center with good procedures in place for the preparation and control of printed materials.</p> <p>Safety-Counts hold monthly team meetings that all members of staff are invited to attend. During the meetings a range of topics relating to the running of the training center is discussed. Minutes are recorded with attendees signing them as confirmation and agreement. The minutes are then distributed and briefed to non-attendees who also sign confirmation of receipt. Although attendees sign the minutes, this is done as confirmation of understanding and not as confirmation of attendance. It is advised that the provider introduces a separate attendance form that is signed at the start of the meeting.</p> <p>The Rail Procedures Manual contains the providers process regarding the issuing of briefings to all staff. Evidence of briefings being acknowledged and signed by Trainers and Assessors was provided during the visit.</p> <p>The provider has a procedure that references the conditions for skills fade as set out in RTAS V2.1 and states what is required should it be required.</p> <p>Safety-Counts has procedures in place for the provision of additional support for learners. At the start of every training event and during the booking process it is asked if learners have any support requirements. Along with various resources such as coloured paper or overlays they also can provide a reader/scribe to a learner, where permitted by RTAS.</p>			
POSITIVE FACTORS	✓	N/A	
AREAS FOR IMPROVEMENT (AFI)	➤	Introduce a separate attendance register that is signed at meetings.	
NON-CONFORMANCES	•	N/A	

EVENT PLANNING AND DELIVERY			
Procedure Present/Available	COMPLIANT	Course Management	COMPLIANT
Compliant With RTAS	AFI IDENTIFIED	Course Planning	AFI IDENTIFIED
FINDINGS			
<p>Safety-Counts have a documented procedure within the Rail Procedures Manual stating their various roles and responsibilities as a provider regarding planning and delivery of training and assessment events. These processes cover the majority of RTAS V2.1, however there are a minor areas within the manual that require expansion to capture the good work evidenced during the visit that the provider completes as standard. These are referenced below.</p> <p>The providers current process for checking their own capabilities pre-event requires updating as currently these checks are completed at the quarterly appraisals. The frequency of these checks should be increased to be completed, ideally, before every event and documented. The Rail Procedure Manual should also be updated to reflect the changes in this process.</p> <p>All events are planned and scheduled by Safety-Counts Training Coordinator and the 'OnTrac' booking system is used to good effect through the planning stage. The provider has worked closely with 'OnTrac' to help adapt the system to meet their requirements and to add various 'fail safe' elements to avoid any potential breach of RTAS V2.1 such as candidates not appearing on the course register until all pre-requisites have been completed. The Event Calendar on Skills Backbone is updated regularly, in good time and with a good level of detail for the on-site assessments.</p> <p>Course durations are planned in line with the days stipulated within the training material and a procedure is in place if a change of Guided Learning Hours [GLH] is required. However, this procedure needs a minor amendment regarding document retention to bring it fully inline with RTAS V2.1 and what the provider was observed to complete.</p>			
POSITIVE FACTORS	✓	The Course Booking process is well managed and a good use of the 'OnTrac' Booking system.	
AREAS FOR IMPROVEMENT (AFI)	➤	Increase the frequency of the providers own capability checks and document when completed.	
	➤	Update the Rail Procedures Manual to include the retention of the Progress Record for a GLH change.	
NON-CONFORMANCES	•	N/A	

MANAGEMENT SYSTEM REQUIRMENTS

Management Systems			
Procedure Present/Available	COMPLIANT	Notification of Results	COMPLIANT
Compliant With RTAS	AFI IDENTIFIED	Extensions of Scope	COMPLIANT
Management Of Breaches	AFI IDENTIFIED	Registration/Upskilling	COMPLIANT
FINDINGS			
<p>The provider has a procedure with the Rail Procedures Manual that covers the management of suspected breaches of the RTAS rules. However, this section requires some expansion as identified below.</p> <p>Safety-Counts Rail Procedures Manual fulfills the requirements for the notification of training and assessment outcomes on Sentinel. Once a course has been completed by the Trainers and Assessors the completed packs are returned to the Training Coordinator who notifies the results on Sentinel as soon as possible and required 21 days.</p> <p>The Rail Procedure Manual includes the process for extending the scope of assurance for both the Provider and the upskilling of its Trainers/Assessors. Safety-Counts also have a detailed procedure regarding the mentorship of new Trainers and Assessors. These procedures meet the requirements of RTAS V2.1 and contain a good level of detail.</p>			
POSITIVE FACTORS	✓	N/A	
AREAS FOR IMPROVEMENT (AFI)	➤	Update Rail Procedure Manual to include reference that trainers/assessors can not be de sponsored when being investigated.	
	➤	Update the Rail Procedure Manual to state that the provider will protect the evidence in the case of a suspected breach of the RTAS rules.	
NON-CONFORMANCES	•	N/A	

PREMISES [Quality of Provision]

GRADE: Silver

DESCRIPTION OF SETTING
<p>Safety-Counts Ltd’s training center is based in Caerphilly in South Wales, and is located on an industrial estate in a managed services building. The venue is easy to find due to signage on the doors and has plenty of on-site parking. The venue has good transport links, based six miles from junction 32 of the M4 and Aber train station is a fifteen minute walk from the venue with regular trains to Cardiff.</p> <p>The premises has two large, fully equipped classrooms, a main office and a breakout area with seating, tables and refreshments. The venue is spacious, clean and well lit. There is also a small practical area within one of the breakout room allowing the DCCR practical to take place on site.</p> <p>Safety-Counts do not own any of their own Practical Training Sites, but are approved to use three sites owned by others in South Wales for Track Induction and On-Track Plant.</p>

HEALTH & SAFETY			
Access/Egress	COMPLIANT	Fire Safety	COMPLIANT
Security	COMPLIANT	First Aid	COMPLIANT
Documents	COMPLIANT	Carbon Management	COMPLIANT
FINDINGS			
<p>Safety-Counts is situated at the rear of an industrial estate. The facility is secure, with all windows and doors locked at night and the additional protection of sliding railings across the car park entrance?. The signage on the building is clear so learners know what doors they are to enter through for the center. Throughout the building all relevant, current documents and procedures are displayed for all to read.</p> <p>The fire fighting equipment is positioned at various points around the premises and all are correctly labelled. All the equipment had been serviced by a third-party provider and all were in date and in good condition. The fire alarm system is controlled and maintained by the building owners with fire drills and fire alarm tests taking place regularly, under the supervision of Safety-Counts fire warden.</p> <p>All members of the Safety-Counts team are trained in First Aid at work making sure that there is a trained first aider on site at all times. An in date first aid box and defibrillator is located within the main office and first aid signs around the building state direct users of the building where this can be located.</p>			
POSITIVE FACTORS	✓	N/A	
AREAS FOR IMPROVEMENT (AFI)	➤	N/A	
NON-CONFORMANCES	•	N/A	

WELFARE			
Refreshments	COMPLIANT	Smoking Facilities	COMPLIANT
Breakout Area	COMPLIANT	Changing Facilities	AFI IDENTIFIED
Toilet Facilities	AFI IDENTIFIED		
FINDINGS			
<p>Safety-Counts has a dedicated breakout room that contains tables and chairs for the learners to use during their breaks. There is also a drinks machine, water dispenser and fridge. Safety-Counts also provide lunch for learners who attend their courses and cater for any dietary requirements.</p> <p>There is a range of toilet facilities within the building, male and female toilets as well as a unisex disabled facility that also contains a shower. These are clean, well maintained and have adequate sanitary disposal arrangements. There is a small maintenance issue inside the ladies toilets where the lock on the end toilet cubical does not work. Whilst there are two more cubicles, this should be repaired. The toilets are sufficiently sized to provide changing facilities and there is a store room to dry wet and/or contaminated PPE.</p> <p>Learners are informed by the trainers during their induction that the designated smoking area in the car park. Disposal boxes are attached to the side of the building to highlight the areas where smoking is permitted.</p>			
POSITIVE FACTORS	✓	Provision of lunches to learners who attend their courses.	
AREAS FOR IMPROVEMENT (AFI)	➤	Repair the broken lock on the end cubical in the ladies toilet.	
NON-CONFORMANCES	•	N/A	

CLASSROOM			
Suitable Sizes	COMPLIANT	Lighting/Heating/Electrical	COMPLIANT
Clean & Tidy	COMPLIANT	Classroom Displays	COMPLIANT
Office Equipment	COMPLIANT	Suitable ILT	COMPLIANT
Suitable For Assessments	COMPLIANT	Components & Equipment	COMPLIANT
FINDINGS			
<p>The training center has two classrooms, both of a large size. All the classrooms are clean and tidy with enough space to enable comfortable and effective learning. Due to the choice of classroom sizes each delegate can have their own table to allow for the correct distancing during the assessment process as required by the quality framework. All classrooms are well equipped with office equipment that is of a good and fully functioning standard.</p> <p>The classrooms are well lit with energy saving motion detecting LED lighting and all rooms have radiators for heating. Both classrooms have good sized windows that open to allow fresh air in and there are fans to help with cooling. Each classroom is also equipped with a suitable amount of, well positioned, electrical sockets preventing trip hazards from trailing wires.</p> <p>The classrooms have various industry, and provider created health and safety posters on its walls along with generic learning aids that the trainers use during the events. Both classrooms have a whiteboards, flipcharts and a widescreen TV on the walls which connects directly to the Trainers laptop. The white boards and the TV's are well positioned within the rooms allowing an uninterrupted view for all learners.</p> <p>The provider also has a collection of 'show and tell' items in both classrooms that the trainers can use as reference during their teaching to make the events more interactive.</p> <p>The trainer completes a thorough checklist before each event to make sure that the classroom is correctly equipped, safe and in good working order. This is retained within the course packs and any issues are reported immediately.</p>			
POSITIVE FACTORS	✓	A good selection of learning aids are available in the classrooms for trainers to use.	
AREAS FOR IMPROVEMENT (AFI)	➤	N/A	
NON-CONFORMANCES	•	N/A	

PRACTICAL AREA			
Risk Assessed	COMPLIANT	Complies to Training Plan	COMPLIANT
Signed Task Brief [Non-NRMI]	COMPLIANT	Tools & Equipment	COMPLIANT
FINDINGS			
<p>The practical area located at the venue is positioned inside the break out room in the main office. This is a small section of ballasted track with a length of third rail which is used to completed PTS DCCR practical training and assessment. Practical sessions of Track Induction and On-Track Plant are delivered on one of three local externally owned practical sites which Safety Counts are authorised to use.</p> <p>The practical area has been fully risk assessed and all learners sign a task brief before leaving the classroom. The signed task brief is then retained within the completed event paperwork. These documents link to the training plans and cover all the necessary Health & Safety requirements required by RTAS V2.1 and the training standards.</p> <p>Tools and equipment are housed in the store room and can be made available on site when required. All the tools and equipment are fit for purpose and are relevant to the courses being delivered.</p>			
POSITIVE FACTORS	✓	N/A	
AREAS FOR IMPROVEMENT (AFI)	➤	N/A	
NON-CONFORMANCES	•	N/A	

Assurance Managers Statement

Overall the provider has solid, documented procedures in place which are compliant with the RTAS V2.1 Rules. The high standards set by Safety-Counts directors and drive to deliver high quality training and assessment services to the rail industry has cascaded throughout the whole team. Their dedication and commitment to doing a good job, correctly and most importantly, safely is clear through all of their actions.

Findings from the Assurance Visit demonstrates that the effectiveness of the Providers detailed Rail Procedures Manual and proactive commitments to standardisation has a positive impact throughout its day to day and strategic activities. The verification completed during the visit evidenced a high standard of work with a minor discrepancies identified which root cause is evident to have been human error opposed to any level of procedural failure. The providers' workplace assessment packs are of an excellent standard.

Safety-Counts are a small provider with a team of five knowledgeable and experienced individuals. They are dedicated to continual quality improvement and willing to listen to constructive feedback. Their shared passion for the rail industry and their drive to be the best provider they possibly can be is evident throughout the management system and day to day work.

The provider has a good attitude toward sustainability and takes active steps to reduce its carbon footprint. Despite being in a managed services building, and therefore limited in what they can drive themselves, they actively champion initiatives such as recycling, reduction in electric usage and only purchase products from likeminded companies. A future ambition is to own their own premises where they will be able to implement more features to develop and grow sustainability opportunities.

It is anticipated that the actions raised from the compliance visit will be addressed promptly and effectively by the providers management team as their systems and commitment to delivering quality services fully enable this. The progress they have made since becoming an assured provider in 2019 show cases their strengths and dedication to the services they provide.

JUDGEMENTS

Judgement	How the grade is achieved
Gold	Gold grade will be awarded when all Leadership & Management Compliance and Premises Specification requirements are met and/or exceeded with no Compliance Action Plan required.
Silver	Silver grade will be awarded when all Leadership & Management Compliance and Premises Specification requirements are mostly met with a minimal Compliance Action Plan required.
Bronze	Bronze grade will be awarded when all Leadership & Management Compliance and Premises Specification requirements are mostly not met with a significant Compliance Action Plan required or the Assured Provider is a new Provider with insufficient time passed to generate the required volume of evidence to demonstrate compliance to requirements.
Inadequate	Inadequate grade will be assigned when all Leadership & Management Compliance and Premises Specification requirements are not met with a large Compliance Action Plan required and/or where non-conformances identified are of a safety critical or deliberate breach nature. The provider will be suspended from delivery until it can demonstrate to NSAR that the areas for improvement have been addressed, which must be within 4 months. Where corrective actions are not implemented within 4 months Assurance to deliver training and/or assessment will be withdrawn for a period of no less than 6 months. Assurance to deliver training and/or assessment may be permanently withdrawn.
Next Steps	
<ol style="list-style-type: none"> The provider will receive their next Assurance Visit: <ul style="list-style-type: none"> Gold – between 15-18 months from the date of the last visit [subject to change]. Silver - within 12 months from the date of the last visit [subject to change]. Bronze – between 9-12 months from the date of the last visit [subject to change]. NSAR operates an unannounced visit regime, whereby the provider can be visited without notice at any time between assurance visits. In addition, Delivery and Observation visits of training/assessment delivery are undertaken to evaluate quality of Leadership & Management, Quality of Provision, Outcomes for Learners and Personal Development, Behaviour & Welfare. Delivery and Observation visits can be both unannounced and notified. 	

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