

ELEMENT 2 - HEALTH AND SAFETY MANAGEMENT SYSTEM – PLAN

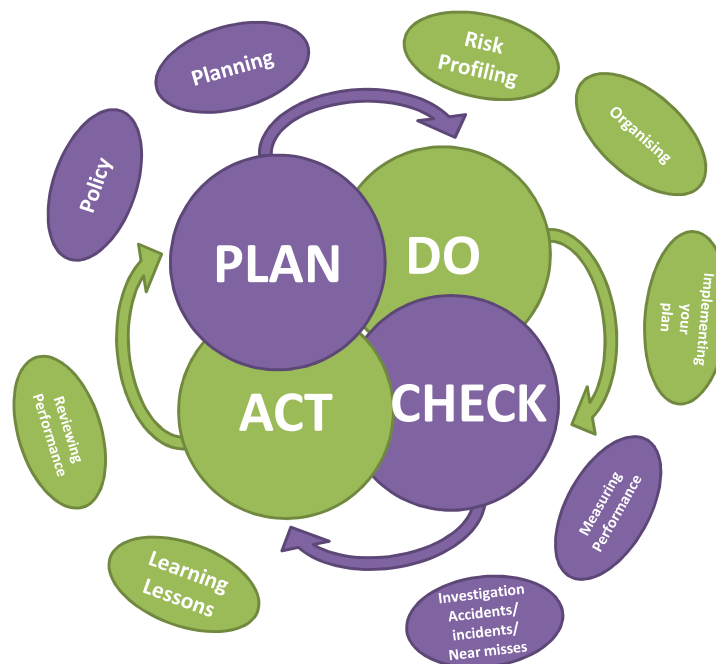
SAFETY POLICIES

- 2.1 Outline the key elements of a health and safety management system
- 2.2 Explain the purpose and importance of setting policy for health and safety.
- 2.3 Describe the key features and appropriate content of an effective health and safety policy.

2.1 HEALTH AND SAFETY MANAGEMENT SYSTEMS

There are many different systems based on different standards, some covering health and safety, quality and or the environment. They are all based around Think – Do – Check.

In 2013 the HSE moved away from using the POPMAR (Policy, Organising, Planning, Measuring performance, Auditing and Review) model of managing health and safety to a 'Plan, Do, Check, Act' approach.



The move towards Plan, Do, Check, Act achieves a balance between the systems and behavioural aspects of management. It also treats health and safety management as an integral part of good management generally, rather than as a stand-alone system.

The high-level descriptions may vary, depending on the industry or sector you are working in, but a summary of the actions involved in delivering effective arrangements and how they are frequently described is given in Table 1, under the

headings of Plan, Do, Check, Act. The HSE guidance note HSG65 supports the requirement for an H&S policy with guidance on how safety can be organised and arrangements effectively maintained. This is very much about ensuring safety is managed and systems are actually followed, monitored and reviewed.

Plan, Do, Check, Act	Conventional health and safety management	Process safety
Plan	Determine your policy/plan for implementation	Define and communicate acceptable performance and resources needed
Do	Profile risks/Organise for health and safety/Implement your plan	Identify and assess risks/Identify controls/Record and maintain process safety knowledge Implement and manage control measures
Check	Measure performance (monitor before events, investigate after events)	Measure and review performance/Learn from measurements and findings of investigations
Act	Review performance/Act on lessons learned	

HSG65 Managing for Health and Safety

PLAN INCLUDES DEVELOPING A POLICY AND PLANNING FOR SAFETY

- Think about where you are now and where you need to be.
- Say what you want to achieve, who will be responsible for what, how you will achieve your aims, and how you will measure your success. You may need to write down this policy and your plan to deliver it.
- Decide how you will measure performance. Think about ways to do this that go beyond looking at accident figures; look for leading indicators as well as lagging indicators. These are also called active and reactive indicators.
- Consider fire and other emergencies. Co-operate with anyone who shares your workplace and co-ordinate plans with them.
- Remember to plan for changes and identify any specific legal requirements that apply to you.
- This includes the provision of a H&S policy

Policy - There is a legal requirement to have a health and safety policy, it should set the framework for managing safety throughout the organisation, from top to bottom.

S.2 (3) Safety Policy - An employer must: -

- If they have 5 or more employees, prepare a written statement of their general health and safety policy.
- Set down the organisation and arrangements for carrying out the policy e.g. who is responsible and for what.

- Revise and update as necessary.
- Bring the policy and arrangements to the notice of all employees.

Typically, the initial phase of developing an Occupational Safety & Health (OSH) management system involves the establishment of a corporate policy towards occupational health & safety. This will involve setting clear aims and objectives and establishing the company's approach to health and safety issues although with the principles needed.

The OSH policy should be specific to the organisation, and to both its size and the nature of its activities. Ideally the policy will be aligned with human resource policies which identify people as the key resource within an organisation. Some features of a good OSH policy are described below:

- The policy should show that leadership in OSH will come from the very top of the organisation. Further to this, it should make it clear that management of the health & safety aspects of their function is an integral part of every manager's role.
- The policy should show that the company is not merely concerned with meeting the requirements of legislation, but that a standard of performance will be set which is aimed at securing the health and well-being of all employees. If the stated target for an organisation is simply to meet legislative requirements, then failure to meet the organisational aims means, by definition, that the law is also being breached. However, if the organisation sets a target for performance above the legal minimum, then shortfall in performance (which is fairly likely in the early days of operating such a system) is less likely to lead to breach of statute.
- In relation to health & safety risks to persons other than employees, the policy should demonstrate that the organisation is concerned about the total impact of its undertaking, insofar as it affects not only its own employees, but also workers in co-operating undertakings, contractors, visitors and the public at large. Such statements of social responsibility should be common to all aspects of the organisation's impacts, including environmental, employment of overseas labour etc.
- Although successful management of occupational health & safety will ultimately impose less of a financial burden on the organisation than will failure in this respect, it is necessary to provide adequate resources in the first instance. The policy should reflect the organisation's commitment to provide such resources, both in terms of time and money for equipment, training etc.
- Set clear aims and objectives
- Establish the company approach to H&S issues
- Define the general intentions in relation to H&S
- Set criteria and principles for taking H&S actions and responding to H&S issues

Finally an undertaking to aim for continual improvement is an acceptance that the organisation will always have scope for improving its performance and that the issue must be continually kept under review so that both defects in the system and opportunities for improvement can be identified.

To implement your health and safety policy, you need to establish and maintain an effective health and safety management system that is proportionate to the risks.

You should set the direction for effective health and safety management, and a policy that sets a clear direction will help to ensure communication of health and safety duties and benefits throughout the organisation.

Why planning is essential

Planning is essential for the implementation of health and safety policies. Adequate control of risk can only be achieved through co-ordinated action by all members of the organisation. An effective system for health and safety management requires organisations to plan to:

- control risks;
- react to changing demands;
- sustain positive health and safety attitudes and behaviours.

Effective planning

Effective planning is concerned with prevention through identifying and controlling risks. This is especially important when dealing with health risks that may only become apparent after a long period of time.

In addition to setting your policy, planning should include steps to ensure legal compliance and procedures for dealing with emergency situations. It should involve people throughout the organisation.

Planning the system you will use to manage health and safety involves:

- designing, developing and implementing suitable and proportionate management arrangements, risk control systems and workplace precautions;
- operating and maintaining the system while also seeking improvement where needed;
- linking it to how you manage other aspects of the organisation.

In order to plan successfully, you need to establish:

- where the organisation is now, by considering accurate information about the current situation;
- where you need to be, using legal requirements and benchmarking to make comparisons;
- what action is necessary to reach that point.

DO

- **Identify your risk profile** - Assess the risks, identify what could cause harm in the workplace, who it could harm and how, and what you will do to manage the risk.
- Decide what the priorities are and identify the biggest risks.
- **Organise your activities to deliver your plan**

In particular, aim to:

Involve workers and communicate, so that everyone is clear on what is needed and can discuss issues – develop positive attitudes and behaviours.

Provide adequate resources, including competent advice where needed.

Policies are implemented by people and this requires their continued motivation and involvement. Once responsibilities and key roles are defined and described it is important that action is taken to ensure these responsibilities can actually be met by the individual in these roles. Successful organisations establish, operate and maintain systems for the four C's, that is, **Control, Co-operation, Communication, and Competence**. Commitment throughout all levels of the organisation from the MD to every employee must be considered.

- **Implement your plan** - Decide on the preventative and protective measures needed and put them in place.
- Provide the right tools and equipment to do the job and keep them maintained.
- Train and instruct, to ensure everyone is competent to carry out their work.
- Supervise to make sure that arrangements are followed.

A key aspect of planning is risk assessment since if we do not know what risks there are in our area, we are in no position to manage them. Risk Assessment and Risk Control measures need to be developed so that the specific types of hazards within the workplace are dealt with. Safe systems of work and training may be needed to ensure standards are implemented and maintained. Emergency procedures and evacuation procedures will be needed and practiced.

Emergency procedures

Employers must explain clearly the procedure for any worker to follow in serious and imminent danger. Employees and others at work need to know when they should stop work and how they should move to a place of safety. In some cases this will require full evacuation of the workplace, in others it might mean some or all of the workforce moving to a safer part of the workplace.

This section of HSG65 also includes the control of contractors; anyone engaging contractors has health and safety responsibilities, both for the contractors and anyone else that could be affected by their activities. Contractors themselves also have legal health and safety responsibilities. Make sure everyone understands the part they need to play in ensuring health and safety. Contractors may need induction and even formal training to be able to work on a specific client's site.

Use of contractors in itself does not result in poor health and safety standards but poor management can lead to injuries, ill health, additional costs and delays. Working closely with the contractor will reduce the risks to your own employees and the contractors themselves.

Remember that contractors may be at particular risk; they may be strangers to your workplace and therefore unfamiliar with your organisation's procedures, rules, hazards and risks. Even regular contractors may need reminding. The level of control needed will, of course, be proportionate to the complexity of the task.

On sites with major accident hazards, consider turnarounds and span of control – given the potentially very high numbers of contractors on-site (compared with the numbers in routine operations).

Implementing your plan - In addition to ensuring everyone is competent to carry out their work safely and that there is adequate supervision to make sure arrangements are followed, workplace precautions will be easier to implement if:

- risk control systems and management arrangements have been well designed;
- those systems and arrangements recognise existing business practice and human capabilities and limitations.

The key steps are to decide on the preventive and protective measures needed and put them in place. Provide the right tools and equipment to do the job and keep them maintained. Train and instruct, to ensure everyone is competent to carry out their work. Supervise to make sure that arrangements are followed.

Documentation on health and safety should be functional and concise, with the emphasis on its effectiveness rather than sheer volume of paperwork.

Focusing too much on the formal documentation of a health and safety management system will distract you from addressing the human elements of its implementation – the focus becomes the process of the system itself rather than actually controlling risks.

In some cases, the law requires suitable records to be maintained, eg a record of risk assessments under the Management of Health and Safety at Work Regulations 1999 (MHSWR) and the Control of Substances Hazardous to Health Regulations 2002 (COSHH).

Implementing risk control plans

The control of relatively minor risks affecting all employees (such as ensuring passages and gangways remain free from obstruction) can be dealt with by a number of simply stated general rules. The control of more hazardous activities may need more detailed risk assessments and controls.

CHECK

- **Measure your performance** Make sure that your plan has been implemented – ‘paperwork’ on its own is not a good performance measure.
- Assess how well the risks are being controlled and if you are achieving your aims. In some circumstances formal audits may be useful.
- **Investigate the causes of accidents, incidents or near misses**

There are two parts to measuring performance, reactive monitoring which looks at past events such as accidents and active (or proactive) monitoring which measures more positive issues such as the amount of training that has been undertaken or the number of risk assessments reviewed. This data can be used to check how far the company is achieving its standards. (See NGC1 Element 4)

ACT

- **Review your performance** Learn from accidents and incidents, ill-health data, errors and relevant experience, including from other organisations.

- Revisit plans, policy documents and risk assessments to see if they need updating. (See NGC1 Element 5)
- **Take action on lessons learned, including from audit and inspection reports**

The primary purpose of performance review is to enable organisations to learn by experience and use the lessons learned to improve their health and safety performance. This section requires the evaluation of data from the Measuring phase and looks at other stages of the SMS, have targets been achieved and what new targets are needed. The options for remedial actions and improvements need to be considered. The reviews should be conducted regularly by managers at all levels in the organisation and cover all aspects of health and safety performance and all parts of the safety management system.

Auditing is the process of obtaining a systematic and independent view of the health and safety performance of an organisation. In the context of auditing, "independent" means independent of the line management being audited. As with reviews, audits should cover all aspects of health and safety performance in a structured way. They normally assess the company and its SMS against a set of predetermined standards. It should identify where standards are not being met and give advice and priorities for improvements.

The new HSG65 document is more focused and provides more practical assistance to both large, medium and small businesses.

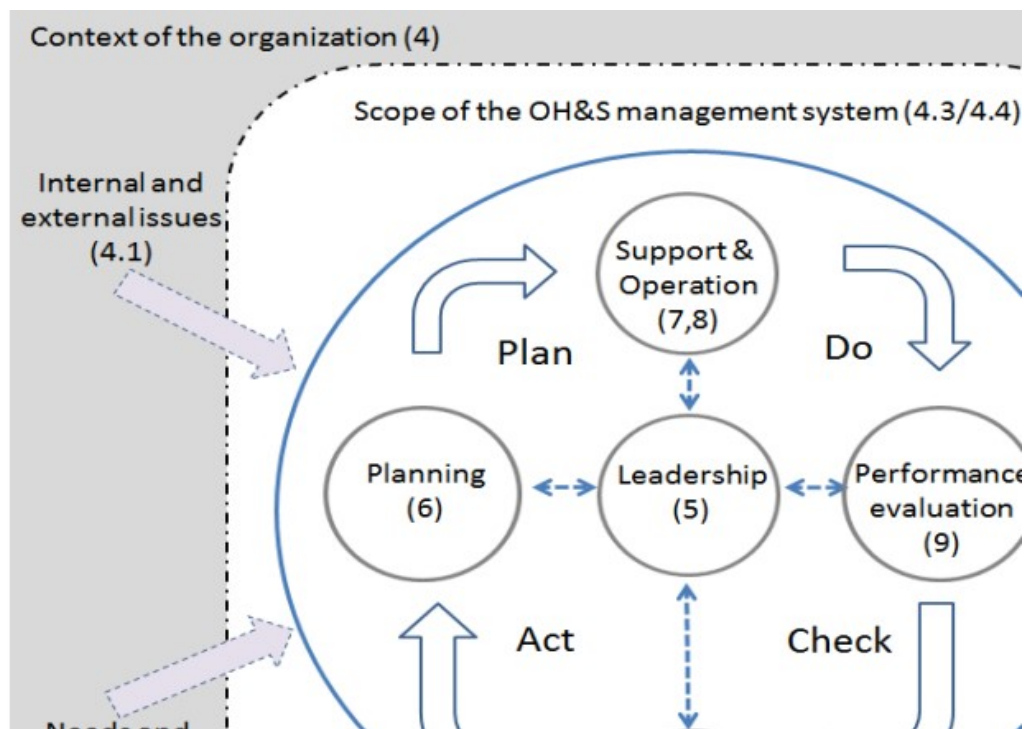
2.2 ISO 45001: 2018

A new ground-breaking standard for occupational health and safety (ISO 45001:2018) was launched on 12 March 2018 by the International Organisation for Standardisation after the content was agreed by a team of international experts.

ISO 45001:2018 has been developed over many years and has gone through extensive consultation and revisions during that time. It will now form the first truly international occupational health and safety standard and will be the 'gold standard' that companies aspire to achieve. As it is the accepted global standard, organisations will increasingly find that it will be the specified standard to achieve in order successfully to bid for contracts where an effective health and safety management system is a prerequisite for a successful bid.

ISO 45001 is not a prescriptive standard for detailing the type of management system that must be in place, but merely specifies elements that must be included in such a system so that an organisation can proactively improve its health and safety performance. It is therefore up to the individual organisation to decide how to fulfil those requirements, deciding what works best for them by integrating these into their own management systems. By taking a risk-based systems approach, ISO 45001 is designed to be applicable to any type and size of organisation. Those organisations with lower risks will therefore only need a simple system, whereas more complex organisations with higher risk levels will require a more sophisticated system. The standard adopts the 'Annex SL' format, which essentially means that the framework of the standard and its content are similar to other ISO standards. This makes it easier for those organisations that wish to attain ISO standards in a number

of areas to implement this, avoiding having multiple management systems to accommodate the requirements of each.



ISO 45001 Overview

The figure above provides an overview of the main components of ISO 45001. Each of these components has to be established with reference to the 'context of the organisation'.

Context of the organisation

This is a new concept that has been introduced and one that organisations may initially struggle to come to terms with! Essentially, it is about how health and safety fits in with the strategic direction of the organisation and how health and safety integrates itself with other business objectives.

All organisations are unique in what they do and how they operate. Owing to this uniqueness, it is not possible to establish a single safety management system that would work for all. Organisations will therefore need to establish for themselves how various factors can influence the outcomes that they desire to achieve with respect to health and safety. This analysis will need to include not only the physical risks but also the risks to the systems and processes that have been put into place to secure health and safety outcomes.

Organisations will essentially need to look at both internal and external factors in evaluating the context of their organisation. External factors can include, for example:

- The relationships that an organisation has and how these are managed. This could include customers, suppliers, contractors and other interested parties;
- Changing technologies and business practices;
- Legislative changes;
- Social, cultural and political factors.

Internal factors could include, for example:

- Management structure;
- Business objectives
- Size and locations of operations;
- Nature and type of activities undertaken;
- Available resources;
- Levels of competence within the organisation;
- Planned changes to the way these are managed.

Leadership and worker participation

Although leadership and worker participation is a legal requirement and has been an essential element of any health and safety management system, it has taken to new levels in ISO 45001. Far greater emphasis has now been placed on these two subject areas and even those organisations that have attained OHSAS 18001 will need to make improvements.

One of the most significant changes that the ISO has introduced is in the emphasis placed on the involvement of top management in demonstrating leadership and commitment to health and safety management. In essence, they must own and drive any health and safety management system, ensuring that it is integrated into the organisation's business processes. Whereas previously, it was normally the health and safety manager that drove the process with the support of top management, now it is the top management that are the driving force, with the health and safety manager acting as a catalyst and facilitator.

The role of the health and safety policy is given prominence in ISO 45001, over and above that required under s2(3) of the Health and Safety at Work Act 1974 including a commitment to continually improving the health and safety management system. The 'organisation and arrangements' sections of the policy are also reinforced with requirements to assign responsibility, for example, for an individual to report on health and safety performance to top management.

The requirements for the consultation and participation of workers in developing, implementing and monitoring health and safety systems are extensive and go far and above that traditionally associated with the work of safety committees. The involvement of such 'non-managerial workers' ranges from:

- Understanding the context of the organisation;
- Setting policies;
- Assigning roles and responsibilities;
- Setting objectives and planning to meet them;
- Involvement in designing and running audits;
- Ensuring continual improvements.

The intention of the standard clearly is to ensure the full involvement of workers in designing and operating any health and safety management system. When deciding to adopt this standard, employers will therefore need to have an effective arrangement for involving workers at the earliest stage.

Planning

Interestingly, ISO 45001 requires organisations to look at the risks and opportunities that need to be addressed to ensure that the management system can deliver its outcomes. This does not restrict itself purely to health and safety opportunities, but

also other opportunities, but also other opportunities that may present themselves, such as strategic and other business opportunities that may have an impact on health and safety. This is part of the approach that ISO 45001 is taking to ensure health and safety is fully integrated into all business decisions.

Included in this section are requirements to:

- Have a system for proactively identifying hazards on an ongoing basis within the organisation (including a focus on harassment, bullying, etc).
- Establish and implement processes to assess risks from any identified hazards. The risks should not just focus on risks to people, plant etc, but also risks that could affect the health and safety management system from achieving its desired outcomes.
- Effectively plan for the elimination of hazards and control of all risks and to evaluate the effectiveness of that plan.
- Establish objectives to maintain and improve the health and safety management system, including assigning responsibilities, resources and evaluation methods.

Support

As with all management systems, if an organisation does not place sufficient resources into its operation, then it will not be successful in achieving its desired outcomes. This section of ISO 45001 looks at what support an organisation should have in place to establish, implement and continually improve its health and safety management system. A number of specific areas are identified, namely:

- General resources such as time, money, personnel, etc;
- Competence (at all levels of the organisation);
- The awareness of workers on a wide range of subject areas;
- Communication arrangements (both internal and external);
- The provision of documented information necessary to ensure that the management system is effective including its updating and having a control system in place to manage that information.

Operation

This section of the standard is concerned with the actual planning and control necessary for the operation of the health and safety management system and the effective control of risks. In particular, it requires that organisations:

- Use the normal hierarchy of controls to manage risks;
- Effectively plan and manage change;
- Use procurement to control risks;
- Proactively manage contracts and contractors to control risk;
- Proactively manage any outsourced work;
- Identify potential emergency situations and plan appropriate responses.

Performance evaluation

An organisation must understand how well it is performing in relation to both external and internal standards if it is to maintain and improve health and safety standards. ISO 45001 states that the minimum that the minimum standard for determining the effectiveness of any health and safety management system should be compliance with legal requirements. To what extent over and above this requirement an organisation will have to measure will be determined by the context of the organisation and the content of its own health and safety management system. The

key here is to choose key an appropriate selection and number of key indicators that will drive improvement in the organisation.

Improvement

The health and safety management system must be considered as organic, and in need of continual review and improvement with requirements to identify opportunities for improvement. Processes will need to be established for dealing with incidents and other non-conformities and for learning from these. Examples of how an organisation could continually improve include:

- Enhancing performance;
- Developing the culture within the organisation;
- Worker involvement in improving the health and safety system; and
- Communication improvements.

2.3 SAFETY POLICIES

Legal requirements

S2.3 Health and Safety at Work Act 1974

- H&S policy
 - written statement
 - organisation & arrangements
 - revise when out of date or if there is a significant change
 - bring to the attention of all employees
 - 5 or more employees
- Supported by Management of Health and Safety at Work Regs 1999
 - Reg 5 H&S arrangements
 - Reg 7 H&S assistance

The policy document must include three essential components:-

- STATEMENT
- ORGANISATION
- ARRANGEMENTS

2.3.1 STATEMENT OF INTENT

A broad statement on the company's strategy in relation to managing safety. It should refer to directors, managers and employees.

- short – usually less than 2 pages
- signed by MD or Chief Executive or someone on site with authority
- should include monitoring arrangements
- should be reviewed periodically
- providing commitment to Health & Safety standards (possibly continuous improvement)
- should give a commitment to legal compliance
- should include commitment to training and resources
- Should identify the importance of risk assessments
- establishes targets, goals and aims

Although the health and safety policy should establish goals and general objectives it is at the planning stage that the specific targets or objectives are set e.g. to reduce RIDDOR accidents by 5% or that all risk assessments will be reviewed annually. Any objectives need to be relevant to the organisation and its business activities and take into account the technological solutions available to it.

Objectives tend to give general principles whereas targets are more detailed, specific and measurable. For example a general objective would be to ensure employees are provided with training, a target would be that all employees will receive an annual fire lecture to cover the fire and emergency procedures.

H&S objectives may be set by the board during its annual review but they may also be set by individual departments and line managers. Equally stakeholders such as customers, clients, local authorities, neighbours and the local community may influence the scope and nature of objectives set.

Objectives and targets need to be documented and should deal with health and safety management issues e.g. accident investigation as well as dealing with how the main hazards and risks within the organisation are dealt with.

Reference should be made to relevant legal requirements to ensure that as a minimum standard the company achieves legal compliance.

Targets (or objectives) must be specific, measurable, achievable, realistic and time bound or SMART. A typical example would be that "All new or amended activities will have a general risk assessment completed before the activity is undertaken for the first time". Targets and objectives must be reviewed to establish if progress is being made and then see if for any reason they are no longer achievable and may need to be updated.

The remainder of this section covers a range of activities required to complete effective planning including:-

- Hazard awareness
- Risk assessment
- Health and safety information sources
- Safe systems of work
- Permits to work

Objectives focus the organisation on its goals and set the company's direction and approach to dealing with H&S issues. Targets are the specific detail on what they want to achieve, these will need to be "SMART". Specific, Measureable, Achievable, Realistic and Timely.

For example the objective could be to improve health and safety standards by reducing injury accidents.

The target could then be "To reduce the number of accidents by the end of the financial year by 5% - based on the previous year."

What factors might need to be considered when setting H&S aims, objectives and targets?

- Responsibilities for action need to be set
- Who will set the objectives and be involved in their development
- Consultation with employees may be completed to ensure they own the targets and objectives set
- Company activities and risk level
- Customer or client need
- The issues highlighted in audits as being managed less effectively
- resources needed to meet the objectives
- Relevant and realistic timescales
- Who will review the objectives and how often
- Accident history - the company may wish to set an objective on the topic which causes the majority of accidents
- The results of benchmarking or experiences of other organizations
- Consider short and long term issues
- Results of benchmarking
- Views of other interested parties
- Technological options

Finally an undertaking to aim for continual improvement is an acceptance that the organisation will always have scope for improving its performance, and that the issue must be continually kept under review so that both defects in the system and opportunities for improvement can be identified.

SAMPLE STATEMENT

"The Managing Director and Board of * Company Name* (the Company) regard people as our most important asset and as such, accepts responsibility for ensuring, as far as possible, the health, safety and welfare of employees and others who may be affected by our activities.

We recognise that the maintenance of a safe place of work and safe working environment is critical to the continued success of the company and accordingly, we view our responsibilities for health and safety equally with our other organisational responsibilities. We require all employees to equally accept their responsibilities as part of the development of a true safety culture. We aim to ensure that other business pressures are not allowed to prejudice the achievement of high standards in relation to health and safety.

The nature of our activities means that a wide range of risks exist but through the implementation of this policy, directors, managers and employees will ensure that all risks to health are addressed and maintained at the lowest level reasonably practicable. The management of health and safety is an integral part of every manager's role. All managers are required to adopt the approach laid out in the Management of Health & Safety At Work Regulations 1999. These state the need for hazard identification, risk assessment and the implementation of control strategies aimed at reducing accidents, injuries and ill health.

This will include the provision of:

- a safe working environment
- safe entry and exit to all workplaces
- adequate welfare facilities
- safe systems of work
- safe plant and equipment
- adequate training, information, instruction and supervision for employees whilst at work

The Company will actively seek the participation of all employees, both formally and informally, with appropriate arrangements made for consultation and monitoring. In addition, any issues relating to health and safety should be brought to the attention of managers as soon as possible so that an early remedy can be sought.

The effectiveness of the policy will be monitored and reviewed by the Board at least annually. To assist this process, safety aims and objectives will be set and performance will be monitored against these objectives.

Managers will ensure that any changes to policy or procedures are brought to the attention of all staff.

We would also remind all employees of their statutory duty to take reasonable care for the health and safety of themselves and others who may be affected by their actions. This includes co-operating in procedures introduced in the interests of health and safety and not interfering with or misusing anything provided in the interests of health and safety. Only with the co-operation and involvement of every employee can the requirements of this policy be met.

Managing Director

Benchmarking - This is not just about comparing data or copying your competitors. Benchmarking is more about continuously learning from others, learning more about your organisation's strengths and weaknesses in the process, and then acting on the lessons learned. This is what leads to real improvement. For more information see the HSE guidance note "indg301".

2.3.2 HEALTH AND SAFETY POLICY - ORGANISATION

This should include the specific roles and responsibilities of:

Chief Executive or Managing Director, Management Board, Senior managers, Supervisors, Health and Safety advisers, Fire wardens, Occupational Health Services, First aiders, H&S Representatives, Contractors and Employees.

This list will be different for each organisation as it should reflect the people and structure of the organisation itself. Normally an organisational chart will be included to show the main lines of responsibility.

This section should specifically state the responsibilities of each role or grade of person to enable those in those roles to be clear about their main areas of responsibility.

Example Responsibilities

THE MANAGING DIRECTOR

The MD is responsible for the overall implementation of the company health and safety policy. They must:-

- Provide the necessary administration and arrangements to facilitate the implementation of a positive and progressive health, safety and environmental function throughout the Company's activities.
- Ensure that the company complies with all necessary health, safety and environmental legislation.
- Nominate a Safety Manager to administer the Health, Safety and Environmental function and provide guidance on the standards required.
- Nominate a senior manager within the businesses, who will be responsible for all Health, Safety and Environmental matters.
- Delegate responsibilities for Health, Safety and Environmental matters to suitably trained and informed individuals.
- Provide facilities for the training of all employees, in compliance with the Health, Safety and Environmental Policy.
- Ensure that all major projects depict a financial consideration for Health, Safety and Environmental control.
- Introduce regular executive meetings to discuss Health, Safety and Environmental issues.
- Ensure there is an appropriate and active Health & Safety policy which is implemented throughout the organisation.
- Ensure that adequate funds and resources to meet Health & Safety requirements are provided.
- Monitor the effectiveness of Health, Safety and Environmental Policy and the responsibility delegated to executive managers, and periodically review objectives set out as part of the policy structures.

Employees

All employees are responsible for:-

- Observing all safety, environmental rules and agreed working procedures at all times.
- Wearing safety equipment and protective clothing when requested to do so by the company representative.
- Inform the person they are responsible to of any accidents, near misses, environmental contamination or damage to plant, production machinery, equipment and buildings in their area, whether an injury was sustained or not.
- Participate in improving health, safety and environmental standards within the Company by making suggestions on any aspect of work that in their opinion may improve working conditions, and reduce accident potential or environmental impact concerning any aspect of the business activity.
- Familiarise themselves with the arrangements for emergency evacuation and fire precautionary procedures including identifying their fire, emergency assembly point.
- Read the Company Health, Safety and Environmental Policy document together with the organisational arrangements for implementing the commitment referred to in the policy.
- Attend training sessions and courses on health, safety, environmental and fire precautionary arrangements.
- Co-operate with Trade Union nominated safety representatives in dispensing their duties, in particular the quest to improve housekeeping and generally raise safety standards in all areas.

2.3.3 HEALTH AND SAFETY POLICY - ARRANGEMENTS

This part of the policy should include the practical arrangements for making safety happen. They should include systems and procedures to ensure safety standards within the organisation are met. This should be a live working document. The subjects covered may include health and safety management issues as well as dealing with specific hazards and risks:

Accident reporting, Risk Assessment, Inspections, Training, Communication, Consultation, Noise control, Fire precautions, First aid, Monitoring, Smoking, Visitors, Control and Selection of Contractors, Machine guarding, Dust control, Health surveillance, Emergency procedures, Safety representation, PPE, COSHH etc.

The exact nature of subjects included will be determined by the hazards faced by the organisation and its staff.

The policy will normally contain a range of safety management issues (e.g. training, risk assessment and accident report) along with sections on how to deal with the main hazards and risks that the organisation faces (e.g. noise, manual handling, using computers etc).

2.3.4 POLICY EFFECTIVENESS AND REVIEW

Consider why an H&S policy may not be effective....

- lack of management support
- another piece of paper
- not communicated
- no cash benefit
- lack of monitoring

Good safety is good management - an effective safety policy is a key component of this process. It is not just a piece of paper! To ensure the policy is implemented there is the additional legal requirement within the Management of Health and Safety at Work Regulations 1999 for every employer to have one or more competent persons with adequate resources to assist the organisation in meeting its health and safety obligations.

Health and safety policies must be reviewed and kept up to date. They must be revised if there is a significant change or if they are out of date, which is why most organisations set a periodic review date.

Consider the events which may lead to a health and safety policy being reviewed and revised. This may include:-

- New or amended legislation.
- As a result of a risk assessment identifying a new hazard or safety issue
- A significant change within the organisation e.g. management structure change or new group of vulnerable people becoming part of the organisation.
- Moving to a new site may bring new issues which will need to be covered by the policy
- As a result of accident trends or a one off serious incident, this may highlight weaknesses in current systems.
- New process or installation or new technology which may bring new hazards to the organisation.
- Requirements of an accredited safety management system e.g. OHSAS18001.
- Or if there are no significant changes then the policy must be reviewed periodically.

Although the policy should be produced with senior management commitment, it is the line manager who is fundamental in ensuring that the standards within the policy are adhered to. The line manager will be involved in a range of tasks including training of new staff, supervision, completion of risk assessments, ensuring PPE is worn and that accidents are investigated.