



Health & Safety Policy & Management Systems

Guidance Note 13

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Introduction

This Guidance Note gives practical information regarding basic health and safety policies and management systems as is targeted at SMEs with over five employees. Any suggested wording for a policy or arrangement should not be copied verbatim but should reflect the policies and arrangements of your company, which should be relevant to the size and nature of your undertaking.

What is a health and safety policy and management system?

A health and safety policy is a description of your Company's commitment to managing the health and safety of staff and others affected by its work activities. It is the central document upon which your health and safety management system is developed. The policy does not need to be complicated or time-consuming, but should be specific to your Company and clearly say how the Company intends to manage health and safety, whom is responsible for what, and what the Company's arrangements are.

Why do I need a health and safety policy?

Section 2(3) of the Health & Safety at Work etc. Act 1974 states:

“Except in such cases as may be prescribed, it shall be the duty of every employer to prepare and as often as may be appropriate revise a written statement of his general policy with respect to the health and safety at work of his employees and the organisation and arrangements for the time being in force for carrying out that policy”.

If your Company has less than five employees, you do not legally need to have a written health and safety policy. However, it is best practice to do so and may be beneficial when submitting tenders and seeking new contracts. This Guidance Note provides you with advice regarding what should be in such a policy. If you feel that this is not for you, you may benefit from viewing Guidance Note 41 and discussing with your auditor.

If you have five or more employees you must comply with Section 2(3) of the Act, by having a written health and safety policy. This usually consists of:

1. A general statement on your intent to manage health and safety.
2. An organisation and responsibilities section which details how the Company is organised to carry out this policy and the responsibilities of key individuals.

3. An arrangements section explaining how the Company will carry out this policy (these arrangements may otherwise be detailed in separate procedural documents if that is how your management system is structured).

In addition, you must:

- Bring the policy to the attention of all your employees.
- Ensure that the policy is reviewed whenever appropriate and ensure that every revision is brought to the attention of your employees.

What is a general statement of intent?

This is a brief statement, in simple terms, of your Company's general aims for ensuring the health and safety of your employees and others affected by your Company's activities. The statement is usually around a page in length and should be signed and dated by one or more members of senior management within the Company to demonstrate commitment from the top and that health and safety management is taken seriously. Please note: A policy submitted for assessment that does not include an actual signature will not be accepted.

The following types of information should be considered for inclusion in this section:

1. The intent to comply with the Health & Safety at Work etc. Act 1974 and other health and safety legislation and achieve an exemplary standard of health and safety.
2. A brief synopsis of how your Company intends to make this a reality i.e. by providing a safe working environment, safe systems of work, providing adequate and sufficient information, instruction, training and supervision etc.
3. The importance of health and safety being an integral part of the management of the Company rather than being an 'add on'
4. The importance of individuals within the Company meeting their responsibilities and co-operating with the Company to successfully achieve its health and safety goals.
5. Recognising that accidents, ill health and incidents result from failings in management control and are not necessarily the fault of individual employees.
6. Recognising that the development of a culture supportive of health and safety is necessary to achieve adequate control over risks.
7. Ensuring a systematic approach to the identification of risks and the allocation of resources to control risks.
8. That health and safety management is subject to continuous improvement.

9. That any neglect of safety or infringement of the law will be treated as a disciplinary matter.
10. That the policy will be reviewed frequently to ensure that it remains valid and appropriate to the Company.

What is an organisation and responsibilities section?

Overall responsibility for health and safety rests firmly with the highest management within a Company (i.e. proprietors, directors etc.). However, ALL individuals within the workforce have to accept a certain duty for health and safety towards themselves and others who might be affected by their acts or omissions.

This section of the health and safety policy should lay out the management channels organised by the Company to implement the policy. Whenever possible, key individuals or their job titles should be named and their responsibilities defined (often a “top-down” diagram is used to chart the organisation). In small businesses, however, it is often one person alone who will take responsibility for co-ordinating health and safety and therefore this section needs to be appropriate to the size of your Company. You should include whatever individuals or job titles as are appropriate for your company. Examples are provided below:

Key responsibilities for a Head of the Company or Managing Director could include:

1. Ensuring suitable financial provision is made for health and safety obligations.
2. Providing appropriate information and instruction to employees.
3. Ensuring work is planned to take into account health and safety issues.
4. Ensuring that all staff receive appropriate training.
5. Assessing and monitoring risk to health and safety.
6. Understanding the company policy for health and safety and ensuring it is readily available for employees.
7. Setting a personal example when visiting site by wearing appropriate protective equipment.
8. Actively promoting at all levels the Company’s commitment to effective health and safety management.

Key responsibilities for a Health and Safety Coordinator / Representative could include:

1. Monitoring the implementation of the health and safety policy throughout the company and reviewing its appropriateness by regular safety audits/inspections carried out in various workplaces.
2. Investigating accidents and implementing corrective action.
3. Reviewing health and safety legislation and implementing any new requirements pertaining to the company's undertaking.
4. Liaising with managers, employees, sub-contractors and specialists as and when appropriate.
5. Collating and reporting any accidents reportable under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) 2013.

Key responsibilities for employees could include:

1. Taking reasonable care for the health and safety of himself and of other persons who may be affected by his acts or omissions at work.
2. Co-operate with the Company to enable it to manage health and safety.
3. Reading and understanding the Company's health and safety policy and carry out their work safely and in accordance with its requirements.
4. Ensuring that all protective equipment provided under a legal requirement is properly used in relation to any instruction / training given and in accordance with this health and safety policy.
5. Reporting any defects to work equipment immediately to the Site Supervisor.
6. Reporting to the management any incidents, which have led or might lead to injury or damage.
7. Reporting any accidents or near misses to the Site Supervisor.
8. Using the correct tools and equipment for the job in hand and in accordance with training and instructions.
9. Co-operating with any investigation, which may be undertaken with the objective of preventing reoccurrence of incidents.

What is an arrangements section / procedural documents?

The arrangements section of your Company's health and safety policy should outline how it will meet the commitments made in the statement of intent. This may be a distinct section within the policy document or an index of separate procedures. Whichever way the safety management system is structured, the arrangements / procedures should describe the systems and processes in place for complying with the various legislative requirements that apply to your business. It should also detail how your Company will ensure employee health and safety by eliminating or reducing, so far as is reasonably practicable, the risks posed by the hazards in your workplace.

Key topics that should be included in this section are detailed below with suggestions as to the information which should be detailed therein. You should ensure that the information you add accurately describes how your company manages the topic and be proportionate to the size of your undertaking. Please note: this list is not intended to be exhaustive and additional arrangements relevant to your Company undertakings may also be included.

Risk assessment

This could include stating:

1. Who is responsible for undertaking risk assessments.
2. That hazards are to be considered systematically, their level of risk determined, and appropriate control measures and work methods established to minimize the risk of injury.
3. Where the person does not have sufficient knowledge about a specific hazard, they will seek advice from the H&S Co-ordinator / Representative.
4. That risk assessments will be made available to all staff.
5. Who to report to if a risk assessment is no longer relevant or on site issues that affect the risk assessment are discovered.
6. That risk assessments will be subject to monitoring and review to ensure that they are suitable and sufficient.

Staff consultation

This could include stating:

1. That the Company plan to meet their duties under the Safety Representatives and Safety Committees Regulations 1977 and the Health and Safety (Consultation with Employees) Regulations 1996.

2. That the company will communicate and consult with all employees on the following issues:
 - The content of the policy
 - Any rules specific to a site or job
 - Changes in legislation or working best practice
 - The planning of health and safety training
 - The introduction or alteration of new work equipment or technology.
3. How consultation will take place (i.e. memos, emails, briefings, toolbox talks, formal staff meetings etc.)

Training

This could include stating:

1. That all employees are given training appropriate to their responsibilities.
2. That training will be provided for the following situations:
 - Induction training for new employees (health and safety awareness, company procedures etc.)
 - The introduction or modification of new / existing machinery or technology
 - A change in employee position / work activity or responsibility.
3. That specific training will be provided for work with hazardous substances, use of personal protective equipment (PPE), manual handling, work at height etc.
4. Any training provided by the company will be formally recorded with a hard copy kept on file.
5. A programme of continual professional development and refresher training will be undertaken to keep employees up to date with legislation and industry best practice.

Fire and emergencies

This could include stating:

1. That the Company take account of fire hazards in the workplace and undertake a fire risk assessment.
2. That all employees have a duty to conduct their operations in such a way as to minimize the risk of fire, including complying with the Company's no smoking policy.
3. That Site Supervisors are responsible for keeping their operating areas safe from fire, ensuring that their staff are trained in proper fire prevention practices and emergency procedures.

4. Combustible materials are to be kept separate from sources of ignition and not allowed to build up.
5. The actions to be taken upon discovering a fire.
6. The actions to be taken upon hearing the fire alarm.
7. Procedures for dealing with any other emergencies relevant to the business (i.e. flood, bomb threat etc.)

First aid

This could include stating:

1. That adequate first aid provision will be made at every place of work occupied by the Company.
2. Where suitable first aid boxes can be obtained, either from the Company or in agreement with the Client / Principal Contractor.
3. Who acts as the Qualified First Aider(s) / Appointed Person(s).

Accident reporting and investigation

This could include stating:

1. That all accidents MUST be reported to your Site Supervisor and the details recorded in the accident book. Serious accidents where hospital treatment is required must be reported to the Health and Safety Co-ordinator / Representative as soon as possible after the incident.
2. That the Company intends to comply with the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) 2013 by reporting the following:
 - Deaths
 - Specified injuries
 - Injuries which have caused over seven days' incapacitation (not counting the day on which the accident happened)
3. Who will be responsible for forwarding notification to the enforcing authorities via:
 - The web at <http://www.hse.gov.uk/riddor/report.htm>
 - Telephone 0845 300 9923 (opening hours Monday to Friday 8.30 am to 5 pm).
4. Who will be responsible for investigating the causes of an accident in order to:
 - To determine the cause(s) with a view to preventing a recurrence
 - To gather information for use in any criminal or civil proceedings
 - To confirm or refute a claim for industrial injury benefit
 - To prepare notification to be made to the Health and Safety Executive

5. That the aim of the investigation will be to seek to answer the following questions:
 - WHAT caused the accident?
 - WHO was involved?
 - WHEN did it occur?
 - WHY did it occur?
 - HOW could it have been prevented?
 - HOW can a recurrence be prevented?

Work equipment

This could include stating:

1. That all work equipment (including electrical equipment) used at work, as part of the Company's undertaking will comply with the Provision and Use of Work Equipment Regulations (PUWER) 1998.
2. All electrical equipment will be inspected and maintained according to the risk of the item becoming faulty. This will take into consideration how the equipment is constructed and the environment in which it is used. Where appropriate portable appliance testing will be carried out at an appropriate schedule.
3. An assessment will be undertaken before new equipment is introduced into the working environment in order to ascertain that the equipment is suitable for its intended use.
4. No employee will use work equipment for which they have not received specific training.
5. No employee will knowingly misuse work equipment or remove any guards that are in place to minimise a specified risk.
6. That all work equipment will be maintained and inspected at suitable intervals either internally by a competent person or by specialist external companies.
7. The frequency of work equipment maintenance or inspection will be based on manufacturer's guidance and industry best practice.
8. Any maintenance / inspections undertaken on company equipment will be formally recorded with a hard copy left on file.
9. If any faults or damage are found on any equipment, stop using the work equipment and report the fault to your Supervisor.

Personal protective equipment (PPE)

This could include stating:

1. That appropriate PPE will be issued free of charge to employees as and when necessary for work activities.
2. That training will be provided for employees on the safe use, storage and maintenance of the relevant equipment before issue.
3. That a written record detailing what PPE has been issued will be signed by the employees on receipt of the equipment and the hard copy kept on file.
4. Employees have a legal duty to wear PPE as specified in relevant site rules, risk assessments and method statements.
5. To whom any defects or malfunction of PPE must be reported.

The control of substances hazardous to health

This could include stating:

1. Before any hazardous substances are used during a work process, a material safety data sheet (MSDS) will be requested from the supplier and an appropriate assessment made of the risks from that substance will be undertaken by the Health and Safety Co-ordinator / Representative, in line with the Control of Substances Hazardous to Health Regulations (COSHH) 2002.
2. Alternative less harmful substances will be used wherever possible.
3. Assessments will consider storage, handling, how the substance is used, the quantity used, the routes and level of exposure, PPE requirements, workers' health, and emergency actions.
4. Supervisors will brief staff on any hazard or substance precautions, with written records being located in an accessible location within each department.
5. An inventory of all substances and materials hazardous to health is held at head office.
6. Health surveillance will be provided when determined as appropriate in the COSHH assessment.

Asbestos management

This could include stating:

1. The details of any survey undertaken of the Company's work premises and how it manages the condition of asbestos containing materials (ACMs).
2. That staff will receive annual asbestos awareness training.
3. What staff should do if they believe that have come across ACMs.

Manual handling

This could include stating:

1. That manual handling operations will be assessed to determine risk to those engaged in the activity.
2. That suitable control measures for the management of manual handling risk.
3. That sufficient training will be given to staff.
4. That the Company will endeavour to eliminate manual handling operations where practicable by using mechanical means.
5. Any remaining risks for activities that must be manually handled will be controlled by;
 - Reducing weights
 - Reducing the frequency of manual handling
 - The use of additional manpower
 - Through the provision of suitable equipment to assist in the operation
 - That the selection of appropriate persons to carry out manual handling or lifting tasks will be based on the training given, age, physique etc.

Welfare provision

This could include stating:

1. How staff will have access to adequate welfare facilities, including at a minimum toilet / washing facilities and rest areas.
2. That an agreement has been made with the Client or Principal Contractor to use their facilities if this is relevant.
3. That the company, if acting as a Principal Contractor, will ensure that adequate welfare facilities in compliance with Schedule 2 of the Construction (Design and

Management) Regulations 2015 are provided from the start of the construction phase.

Cooperation / Coordination

This could include stating:

1. That Employees need to familiarise themselves with Client / Principal Contractor procedures when first attending site; in particular general site access, emergency procedures, permit to work systems, high risk activities and adhere to them at all times
2. Before commencing work, the site supervisor will attend any site meetings or inform other trades working in the direct vicinity of the activities of the company of the specific risks and requirements of the work being undertaken.

Monitoring / Audit / Review

Remember - reviewing the policy helps keep it alive!

A revision might consist of simply checking that all areas of the policy are still relevant and then having it re-signed and dated by senior management.

You could include in this section:

1. When the policy and any procedural documents will be reviewed. There is no set requirement for frequency, but best practice generally is a review every 12-18 months' maximum.
2. Who is responsible for reviewing the policy, procedures, risk assessments etc.
3. How other forms of monitoring, audit and review are undertaken and by whom (i.e. workplace / site inspections, management review meetings etc.)
4. That the policy will be reviewed in response to changes in legislation and industry best practice.

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