



# **Health & Safety Policy Arrangements 2018-19**

# Contents

1	Introduction.....	3
2	Health & Safety Planning .....	3
2.1	Hazard Identification and Risk Assessment.....	3
2.2	Compliance with Legal and Other Requirements .....	3
2.3	Health and Safety action Plans .....	4
3	Implementation and Operation .....	4
3.1	Roles and Responsibilities .....	4
3.2	Competence and Training.....	4
3.3	Awareness, Communication, Participation and Consultation .....	4
3.4	Operational Controls over Health and Safety .....	5
3.4.1	Working Environment.....	5
3.4.2	Work Equipment .....	5
3.4.3	Management of Contractors .....	5
3.4.4	Hazardous Substances (COSHH) .....	6
3.4.5	Control of Legionella .....	6
3.4.6	Noise .....	7
3.4.7	Vibration .....	7
3.4.7	Health and Wellbeing.....	7
3.4.8	Emergency Preparedness and Response .....	8
4	Checking.....	8
4.1	Performance Measurement and Monitoring.....	8
4.1.1	Evaluation of Compliance .....	8
4.1.2	Accident/Incident Investigation .....	8
4.1.3	Corrective and Preventive Action .....	9
4.1.4	External audit .....	9

## **1 Introduction**

These Arrangements form an integral part of the Council's Health and Safety Policy and set out the way in which we implement our safety management system. They reflect the requirements of current health and safety legislation and follow the four key principles, planning, implementation and operation, checking and management review as a means of achieving high standards and continuous improvement.

## **2 Health & Safety Planning**

The Council's Safety Management System (CSMS) is designed to encourage safe working practices in order to prevent accidents and incidents, so planning is a vital part of our approach. We do this in a structured way, covering the following important elements.

### **2.1 Hazard Identification and Risk Assessment**

We use an effective method for this through the use of comprehensive risk assessments. We have trained staff who conduct, record and evaluate the identifiable risks and the necessary control measures. This is a proactive approach, aimed at anticipating hazards and preventing accidents and injury.

Completed risk assessments and control measures are communicated to staff and implemented. They are also periodically audited and reviewed to update them and ensure that they remain effective.

New risk assessments are conducted when there is a material change to an existing work activity or environment or where we commence a new activity not already covered by a risk assessment.

The relevant procedures and forms can be found in the Council's Risk Assessment Procedure.

### **2.2 Compliance with Legal and Other Requirements**

The CSMS seeks to achieve best practice standards in the management of health and safety and this requires, as a minimum, that we fully comply with the requirements of relevant legislation and approved codes of practice. In practice we go well beyond this minimum standard, but it's important that we maintain a clear understanding of legal requirements and how we meet them.

We actively check for changes in legislation and codes of practice and update our risk assessments, procedures and approaches as appropriate when any relevant change is introduced. Updated procedures are communicated to staff as necessary and managers are responsible for checking that the change is properly implemented within their areas of responsibility.

Internal audits and reviews of our Health and Safety Policy and Procedures check for compliance to current legislation and codes of practice. The Audit conducted annually by the Council's Health and Safety Consultant provides a further check that we are up to date with external requirements.

## **2.3 Health and Safety Action Plans**

The Council's main health and safety objective is to ensure at all times that it operates and maintains an effective and legally compliant system for managing occupational health and safety

The Council works in partnership with Liberata for the provision of some functions related to health and safety eg strategic health and safety advice, facilities management, health and wellbeing for staff including access to occupational health services. A Partnership Health and Safety Plan outlines these functions and the roles and responsibilities across both organisations. A Joint Work Programme outlines specific tasks to be completed. Both documents are reviewed on a quarterly basis.

For health and safety functions outside of the partnership with Liberata, a health and safety action plan will be drawn up each year following the external audit carried out by the Council's Health and Safety Consultant, QHS Solutions. The plan will outline tasks which need to be completed to ensure compliance with the health and safety objective. Progress against the plan will be monitored on a regular basis.

## **3 Implementation and Operation**

### **3.1 Roles and Responsibilities**

To implement and deliver our Health and Safety Policy and objectives we provide and organise a structure of procedures, resources, roles and responsibilities.

The roles and responsibilities and accountabilities are set out in the Health and Safety Policy. Every Council employee is responsible for health and safety and is required to cooperate with the Council on health and safety matters as it relates to their role.

### **3.2 Competence and Training**

To ensure that employees are able to fulfil their health and safety responsibilities competently we provide training as appropriate. This is so we maintain a culture of health and safety awareness and that our procedures are properly implemented.

A starting point for identifying H&S training needs is the risk assessment process. together with any statutory requirements. Training needs are also identified via the annual performance management process. Following analysis of the performance management process, Liberata's Learning & Organisational Development Officer discusses any training needs identified with the Environmental Services Manager and agrees a programme. Training is delivered via in-house and external providers as appropriate.

All members of Management Team must complete the IOSH Leading Safely course or equivalent.

### **3.3 Awareness, Communication, Participation and Consultation**

Health and safety awareness is driven by various methods, including the Council's Intranet, induction, on line training, emails, team meetings, notices/posters, information leaflets, and one to one meetings.

We engage in two-way communication on health and safety with employees, contractors, clients, and recognised trade unions and provide access to our Policy and Procedures as required. We also provide opportunities for people to participate in

health and safety review and improvement activities, for example risk assessments and control measures, and reporting issues.

### **3.4 Operational Controls over Health and Safety**

The CSMS provides effective health and safety controls over our working environment and activities including contractors and visitors in the workplace. We achieve this by adhering to statutory requirements, carrying out risk assessments and implementing the procedures contained in the CSMS.

#### **3.4.1 Working Environment**

In accordance with the provisions of the Workplace (Health, Safety and Welfare) Regulations 1992, the Council is committed to providing a comfortable, safe and healthy working environment for employees and will take all reasonable measures to ensure that regulatory standards are met and exceeded where possible.

Where the Council shares premises we will work in partnership with the other occupiers to ensure that appropriate conditions are provided for business purposes.

Service Managers at each business location assume primary responsibility for compliance with the above.

#### **3.4.2 Work Equipment**

The Council ensures that all equipment purchased for use at work is safe, suitable for its intended purpose and maintained in good working order.

These responsibilities also extend to the use of work equipment supplied and used by self-employed contractors or other persons working on Council premises, however it does not absolve contractors or self-employed persons from their personal responsibilities under the Provision and Use of Work Equipment Regulations (PUWER).

Managers have direct responsibility for the safety of equipment used within their own service areas. There are also nominated employees in each building who carry out regular inspections and are the key point of contact for reporting faults and organising equipment repairs or replacement as necessary.

#### **3.4.3 Management of Contractors**

All work on Council admin buildings is managed by Liberata Property Services. Liberata uses "SAFEcontractor" a third party health and safety accreditation scheme to check the health and safety credentials of workplace contractors using trained auditors to carry out an initial assessment based on the type of service the contractor will be providing

Liberata as a Company has also achieved SAFEcontractor accreditation believing that we should be able to demonstrate the same standards as we expect from others.

As a back-up Liberata has an internal process for carrying out the necessary H&S checks which will be used in exceptional circumstances e.g. for urgent work or one-off projects.

When working on Council premises managed by Liberata Property Services contractors will be subject to regular monitoring and supervision proportionate to the nature of the work being undertaken and at all times must operate in accordance with the Health and Safety at Work Etc Act 1974.

For any Contractors appointed by the Council to do work outside of the remit of the work managed by Liberata Property Services then it will be the responsibility of the Service Manager concerned to ensure that the contractor is properly assessed prior to appointment and monitored during the work.

Where the Council puts any design contracts out to tender they will be subject to Pre-Qualification Questionnaire and check of health and safety information via the Council e-procurement portal the CHEST.

The Council complies with its duties under the Construction (Design & Management Regulations). Full details of arrangements for this can be found in the Corporate Policy on Compliance.

#### **3.4.4 Hazardous Substances (COSHH)**

The use of hazardous substances is rigorously controlled to protect both Council employees and other people in accordance with the Control of Substances Hazardous to Health Regulations (COSHH).

Managers assume direct responsibility for ensuring that an assessment of the risk posed by hazardous substances is undertaken and appropriate controls are applied to protect anyone who may come into contact with these substances while at work.

Where third parties such as maintenance contractors are using hazardous substances, Liberata Property Services (or the Service Manager organising the work where it is outside the remit of Liberata Property Services) will obtain the Safety Data Sheets and COSHH Assessments from the contractor bringing the substances onto Council premises, and monitor their safe use.

See the Council's COSHH Procedure for further information.

#### **3.4.5 Control of Legionella**

The risk of contamination of domestic water systems by legionnaires' disease is controlled in accordance with HSC Approved Code of Practice L8 "Legionnaires' disease: The control of legionella bacteria in water systems". The Council recognise the serious health implications of poor management in this area and ensure that responsibilities are clearly defined and robust procedures are in place to control the risk of legionnaire's disease at all locations.

A risk assessment is undertaken to identify and evaluate sources of risk and a scheme of work prepared to prevent or control the risk which is implemented via a "responsible person" appointed locally. Appropriate records are maintained and effectiveness of the controls regularly monitored informally via site inspections and formally through the annual Legionella Survey.

Liberata Property Services coordinate the management of Legionella, with a third party specialist (currently Maxigiene) undertaking risk assessments and surveys.

Responsible persons employed by the Council are identified and trained in each building to carry out routine checks and to record these.

See the Council's Legionella Policy for more information.

#### **3.4.6 Noise**

The majority of Council employees will not be exposed to high levels of noise during the course of their work, however where noise hazards are identified all reasonable steps are taken to minimise risk in accordance with the provisions set out in the Control of Noise at Work Regulations April 2005.

In operational areas, such as Environmental Services, where employees could be subject to high levels of noise then noise measurements are undertaken by in-house staff who have been trained. Managers will ensure that risk assessments are completed and measures taken to protect employees through the provision of appropriate equipment, training and occupational health support as necessary.

#### **3.4.7 Vibration**

Some employees within Environmental Services and Neighbourhood Services are subject to vibration during their work. To ensure that we comply with the Control of Vibration at Work Regulations 2005, we have an annual programme of vibration measurement for our equipment, completed by trained in-house staff. Equipment is then labelled with maximum usage times and all employees are issued with personal vibration measurement meters. This information is analysed on a monthly basis.

In addition to this an annual health surveillance programme is coordinated by the Liberata HR Team at Pendle.

#### **3.4.8 Health and Wellbeing**

Implicit within the Council's commitment to provide a safe and healthy working environment is an undertaking to contribute to the physical and mental well-being of employees.

The Council carry out assessments of the tasks, activities and processes, which may potentially affect the health of employees, including those which may result in work related stress.

Integral to the risk management process, is an obligation for employees to notify their manager and HR of any known medical condition which may adversely affect their health at work or impact on their ability to carry out their job safely.

Professional occupational health support is available for all Council employees to address work related health problems including stress related illness, musculoskeletal disorders and other conditions which may adversely impact an individual's health and ability to work. All occupational health referrals are made via Human Resources to the Council's most appropriate occupational health provider.

Recognising the importance of a healthy workforce from both a personal and operational perspective the Council provides an annual Employee Health and Wellbeing Programme. This is coordinated by the Liberata HR Team based at Pendle and supported by Health & Wellbeing Champions in each building. In addition to this

the Council has also introduced an Employee Assistance Programme which gives employees direct 24/7 access to confidential counselling and information and advice on a range of lifestyle issues.

### **3.4.9 Emergency Preparedness and Response**

It is foreseeable that emergency situations can arise, from individual accidents to major incidents. To ensure that we are ready to manage these and place the protection of people at the workplace as the first priority, we have in place comprehensive emergency procedures and business continuity plans. These are communicated to employees and actions and responsibilities are clearly set out in them. The plans are also tested on a periodic basis.

As a Local Authority the Council also has a duty to work with external partners to ensure we are prepared to play a role in incidents outside of our workplace.

The Council also has a duty under the Civil Contingencies Act 2004 to act as a category 1 responder to emergencies.

For further information please see the Council's Intranet.

## **4 Checking**

### **4.1 Performance Measurement and Monitoring**

It's important that we regularly check how well we are doing in managing health and safety, as this is part of making sure our system is effective and identifying areas for improvement. We incorporate advice within INDG417 Leading Health and Safety at Work to follow a Plan, Do, Check Act approach including:

- Setting and an annual health and safety action plan for each service area
- Measuring performance against this action plan
- Carrying out quarterly health and safety inspections
- Recording accidents and incidents (including non-injury incidents)
- Monitoring work related absences and setting a target each year.

The Health and Safety Policy allocates measurement, monitoring responsibilities to key staff.

#### **4.1.1 Evaluation of Compliance**

Annual health and safety audits are undertaken by the Council's H&S Consultant to check each service area's compliance with relevant legislation and conformance to the CSMS. Audit findings are then reported to Management Team.

#### **4.1.2 Accident/Incident Investigation**

We have a detailed approach to investigating accidents/incidents, so that we can identify the root cause and take the necessary corrective or preventive actions which address the weakness and ensure that there is no recurrence.

Accident/incident investigations are carried normally carried out by the employee's immediate line manager, supervisor or appropriate officer with input from managers and other staff members as appropriate. In the event of serious accidents or incidents

the investigation will be led by the Environmental Services Manager with assistance from the Health and Safety Consultant and Health and Safety Officer. Internal training is given to the person leading the accident/incident investigation to ensure the process is carried out thoroughly; there is a standard report form for documenting the results. Findings from the investigation will be shared with the relevant managers and staff members. Any remedial action identified will be implemented as necessary.

For further information please see the Council's Accident Reporting Procedure.

#### **4.1.3 Corrective and Preventive Action**

Where health and safety issues or concerns are identified employees are encouraged to bring them to the attention of their line manager and/ or H&S representative so that they can be rectified.

Where a change is required action will be taken immediately where possible or details will be added to the relevant service area's Health and Safety Action Plan. This will ensure that the necessary corrective or preventive action is determined, implemented, communicated and checked for effectiveness. For example this could include the review of a risk assessment, provision of training or repair to an item of equipment.

#### **4.1.4 External Audit**

We use external audits annually for our safety management system for a number of important reasons:

- To check that we are operating in accordance with the Policy and procedures
- To check that we are compliant with legal and other requirements
- To record and action any nonconformities
- To review the effectiveness of our procedures and documents
- To check we have implemented appropriate control measures
- To identify any improvements

External audits are essential to maintaining the effectiveness of the Policy and CSMS procedures, and the effectiveness of the way we manage health and safety. QHS Solutions conduct the internal audits and they use our audit procedure and forms to take a systematic approach to analysing actual practices against legal requirements and CSMS procedures. They identify and record any non-conformities or other areas for improvement which will be reported and added to the Health and Safety Action Plan to ensure that that they are properly logged and the changes actioned and checked.