

# **PREPARING A BASIC POLICY ON HEALTH AND SAFETY**

Your Practical Guide



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# Introduction

*In any company, most accidents and most cases of occupational ill health can be prevented if proper thought is given to the risks involved in the activities the company is engaged in, and if the relevant precautions are taken.*

The major purpose of a health and safety policy is to do precisely this, and it should:

- identify the risks
- identify the precautions
- show who is responsible for ensuring that the precautions are properly carried out.

Although a written health and safety policy is necessary (it is a legal requirement for anyone with 5 or more employees – see also Health and Safety at Work Act 1974), it must be emphasised that the written word does not always prevent accidents.

It is the implementation and application of the policy that prevents accidents.

An effective health and safety policy is the one that you carry out, not simply the one that you write down.

A health and safety policy is made up of three parts:

- general statement of the employer's policy with regard to health and safety
- the organisation that is necessary within your company for carrying out the policy
- the arrangements for carrying out the policy.

## General Statement of Policy

*This should give, in simple terms, your commitment and general aims regarding the health and safety of your employees and the general public.*

It should contain a clear declaration of your commitment:

- to provide safe and healthy working conditions for your employees, and to ensure that any work activities in which they are engaged do not adversely affect the health and safety of anyone else (e.g. contractors, visitors or other members of the public)
- to facilitate effective consultation on health and safety matters, and to consult individual employees before giving them particular health and safety responsibilities
- to obtain the expert advice necessary for determining the risks to health and safety that arise from the activities of your company, and for identifying the relevant precautions
- to provide your employees with appropriate information and necessary training about the risks to their health and safety which may arise out of their work activities, or place of work
- to ensure that everyone in the company provides the support necessary to achieve the objectives of the general statement of policy
- to safeguard the health and safety of people other than your employees, i.e. general public.

When you draw up your general statement of policy, it should be discussed with your employees and/or their representatives. They often have personal knowledge or experience of particular dangers and may offer practical, common sense suggestions on what should be done to avoid accidents and minimise health risks.

By involving your employees you will also gain their commitment and help to make your company safe.

The policy should be written in a clear and simple style that can be understood by everyone in the company and, where necessary, takes account of the fact that English may not be the native language of all of your employees.

Remember to make allowance in the policy for:

- all employees – including part-time workers, administration staff, contractors and casual workers – as well as visitors and other members of the public
- the need to deal separately with different locations or different departments with separate management.

## Review

### *The general statement of policy should:*

- include your commitment to review it within a certain time (as a minimum at least once every 12 months), or more frequently when significant changes in the company have occurred
- be signed and dated by a senior member of the company.

Having completed the general statement of policy you should bring it (and any future revisions) to the attention of all the company's employees.

This can be achieved in a number of ways, for example posting it on notice boards, issuing individual copies or including it in employment hand books, induction training packs etc.

## Organisation

*Your health and safety organisation is concerned principally with people – their knowledge and training, ensuring that work activities are undertaken safely without risks to health; and allocation of health and safety responsibilities.*

The ultimate responsibility for health and safety in each company lies with your directors and senior management, but in practice duties have to be delegated. It is this delegation which forms the link between policy and organisation. The shape of this organisation depends on the managerial system adopted within your company, and to see the relationships clearly, it may be useful to represent them diagrammatically. Whichever way the organisation is drawn up, it should be easily understood by all.

In most cases, the health and safety organisation within your company should demonstrate the following features:

- An unbroken and logical delegation of duties through your company's management structure down to the employees who are exposed to any hazards that may arise and where most accidents are likely to happen
- The identification of the key personnel who are accountable to your company's senior management for ensuring that detailed arrangements for health and safety are drawn up, implemented and maintained
- The definition of the roles within your company's management structure, including job descriptions that identify specific health and safety roles, to avoid any unnecessary overlapping. A concern for health and safety should be seen as an essential part of good management, and it follows that job descriptions containing such roles should be agreed with the job holder. They should also show the limits of these particular roles.
- Your company should define, and adequately communicate, the allocation of responsibilities, accountabilities, authority and resources for implementing its health and safety policy, commensurate with its size and nature. The formal organisation for joint health and safety consultation and the terms of reference of any joint health and safety committee should also be made known.

- The responsibility and accountability for health and safety should reflect the responsibilities within your company's management structure. Best practice is to allocate the overall accountability to a person at the most senior management level (for instance, the Chairman or Managing Director). This person then assumes responsibility for ensuring that the health and safety management system is properly implemented and is performing to the required standard in all locations and spheres of activity within the company.
- Your company should identify, where appropriate, those within the management structure responsible for co-ordinating and reporting on health and safety matters. Examples might include Production Managers who may have health and safety, as one of their duties, your company's safety adviser, and safety representatives who have been elected or appointed (whether under regulations or not).
- At every level within your company, all employees and staff will need to be aware of the influence that their action or inaction can have on the effectiveness of the health and safety management system. They should demonstrate their commitment by being actively involved in the continual improvement of health and safety performance.

The list below is a checklist of points that should be considered in the written statement of health and safety organisation:

- Are duties and responsibilities for health and safety allocated and recorded in a clear and logical way, with everyone knowing who and what they are responsible for, and to whom they are responsible?
- Is the final responsibility placed on the relevant director or senior manager?
- Are the following responsibilities clearly identified?
  - training
  - monitoring compliance with the health and safety policy
  - maintaining contact with sources of advice, e.g. company's safety adviser, Local Education Authority, Local Fire Authority, Health and Safety Executive
  - responding to safety representatives and to other staff health and safety concerns.

We recommend that the health and safety organisation document be signed and dated by a senior representative of the company such as the Chairman or Managing Director, as should each subsequent revision.

## Arrangements

*The purpose of establishing health and safety arrangements is to indicate how the general policy statement is to be put into effect. They should demonstrate how everybody needs to be involved in maintaining health and safety systems at work and in preventing accidents, as well as recognising personal responsibility and accountability.*

The health and safety arrangements provide procedures, safe systems of work and other rules concerning:

- fire precautions
- accident and illness reporting and investigation, including the monitoring and analysis of statistics on accidents and near misses, and reviewing the arrangements for first-aid
- purchasing, storing, handling, safe use and disposal of substances and materials that are hazardous to health
- food preparation and monitoring/maintaining high standards of hygiene
- instructing employees about safe working methods and training them in health and safety matters
- good housekeeping requirements covering storage facilities, the collection and disposal of refuse, the provision of gangways and welfare arrangements
- special rules for work done at height, alone, or in confined spaces, and for the use of certain electrical equipment or unguarded machinery
- maintenance of buildings and provision of proper inspection arrangements
- identification of precautions and procedures for dealing with any special risks relating to particular types of company building, work activities, traffic systems and the company's premises
- safe systems and methods of work
- maintenance activities and testing, inspection and cleaning arrangements for machinery, plant, and work equipment
- assessment and provision of information, instruction and training where heavy manual handling and lifting is carried out
- assessment, provision and use of protective clothing and equipment
- procedures for introducing new machinery, substances or activities

- arrangements for obtaining – and communicating to employees – information about health and safety matters, including information about articles and substances for use at work – this is especially important on their first introduction, or when people work with them for the first time
- consultation on health and safety matters with company employees and safety representatives, including safety committees
- the means by which training needs are identified and the procedures for ensuring adequate training has been provided
- health and safety inspections, audits or other systems for checking the effectiveness of the arrangements for health and safety
- maintenance, inspection and testing of electrical systems and portable electrical appliances
- control of contractors working in the company's premises and other visitors.

When establishing health and safety arrangements, two points should be borne in mind:

- Those most closely involved in a particular type of work or activity, at whatever level, will have a valuable contribution to make. They are in the best position to suggest how the work can be done safely. This is an area for meaningful consultation. In a complex company environment there will be small groups of employees who have a unique knowledge of their own departmental activities. Probably the most fruitful way an individual can be involved in safety is by thinking of it first in relation to their own working environment and/or their own work activities.
- In working out and preparing safe systems of work, it is essential to consider not only the hazards of the company's activities during a normal working day, but also the special hazards of:
  - maintenance activities and non-routine shift working
  - outdoor and out-of-company activities
  - holiday periods
  - working out of ordinary hours when staffing levels may be reduced
  - training.

A large number of preventable accidents happen outside ordinary working hours and outside normal day-to-day procedures. Health and safety arrangements to ensure safe working should reflect how people work, as opposed to how you would like to think they work.

Within all work groups, special privileges and informal rules and customs exist, and if the policy and its arrangements are to be realistic, they must be taken into account when formulating good working practices.

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