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# Essential format and content of the policy statement

Essentially, a policy statement should consist of three parts, as follows:

## **1 A general statement of intent**

This should outline in broad terms the organisation's overall philosophy in relation to the management of health and safety, including reference to the broad responsibilities of both management and workforce.

## **2 Organisation (people and their duties)**

This outlines the chain of command in terms of health and safety management.

- Who is responsible to whom and for what?
- How is the accountability fixed so as to ensure that delegated responsibilities are undertaken?
- How is the policy implementation monitored?

Other organisational features should include:

- individual job descriptions having a safety content;
- details of specific safety responsibilities;
- the role and function of safety committee(s);
- the role and function of safety representatives;
- and a management chart clearly showing the lines of responsibility and accountability in terms of health and safety management.

The competent person who is to assist with compliance with health and safety requirements should also be included. [Management of Health and Safety at Work Regulations 1992, Reg 6]. (See also employers' duties to their employees.)

## **3 Arrangement (systems and procedures)**

This part of the policy deals with the practical arrangements by which the policy will be effectively implemented. These include:

- safety training;
- safe systems of work;
- environmental control;
- safe place of work;
- machine/area guarding;
- housekeeping;
- safe plant and equipment;
- noise control;
- radiation safety;
- dust control;
- use of toxic materials;
- internal communication/participation;
- utilisation of safety committee(s) and safety representatives;
- fire safety and prevention;
- medical facilities and welfare;
- maintenance of records;

- accident reporting and investigation;
- emergency procedures;
- and workplace monitoring.

(Records of arrangements are also required to be kept where more than five employees are employed.[Management of Health and Safety at Work Regulations 1992, Reg 4].)(See also employers' duties to their employees.)

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## **Basic objectives and general content of statement**

Health and safety policy statements should state their main objectives, e.g.:

- (a) Commit to operating the business in accordance with the Health and Safety at Work Act 1974 and all applicable regulations made under the Act, 'so far as reasonably practicable';
- (b) Specify that health and safety are management responsibilities ranking equally with responsibilities for production, sales, costs, and similar matters;
- (c) Indicate that it is the duty of management to see that everything reasonably practicable is done to prevent personal injury in the processes of production, and in the design, construction, and operation of all plant, machinery and equipment, and to maintain a safe and healthy place of work;
- (d) Indicate that it is the duty of all employees to act responsibly, and to do everything they can to prevent injury to themselves and fellow workers. Although the implementation of policy is a management responsibility, it will rely heavily on the co-operation of those who actually produce the goods and take the risks;
- (e) Identify the main board director or managing board director (or directors) who have prime responsibility for health and safety, in order to make the commitment of the board precise, and provide points of reference for any manager who is faced with a conflict between the demands of safety and the demands of production;
- (f) Be dated so as to ensure that it is periodically revised in the light of current conditions, and be signed by the chairman, managing director, chief executive, or whoever speaks for the organisation at the highest level and with the most authority on all matters of general concern; and
- (g) Clearly state how and by whom its operation is to be monitored.

## **Organisation (people and their duties)**

Suitable policies will demonstrate – both in written and diagrammatic form (where appropriate) – the following features:

- (a) The unbroken and logical delegation of duties through line management and supervisors who operate where the hazards arise and the majority of the accidents occur.
- (b) The identification of key personnel (by name and/or job title) who are accountable to top management for ensuring that detailed arrangements for safe working are drawn up, implemented and maintained.
- (c) The definition of the roles of both line and functional management. Specific job descriptions should be formulated.
- (d) The provision of adequate support for line management via relevant functional management such as safety advisers, engineers, medical advisers, designers, hygienists, chemists, ergonomists, etc.
- (e) The nomination of persons with the competence and authority to measure and monitor safety performance.
- (f) The responsibilities of all employees.
- (g) The arrangements for employee representation on health and safety matters (i.e. whether by trade union safety representatives, employee elected

safety representatives or by direct consultation with each employee (see joint consultation, safety representatives and safety committees).

(h) The involvement of the safety adviser and relevant line/functional management at the planning/design stage.

(j) The provision of the means to deal with failures in order to meet job requirements.

(k) The fixing of accountability for the management of health and safety in a similar manner to other management functions.

(l) The organisation must unambiguously indicate to the individuals exactly what they must do to fulfill their role. Thereafter a failure is a failure to manage effectively.

(m) The organisation should make it known – both in terms of time and money – what resources are available for health and safety. The individuals must be certain of the extent to which they are realistically supported by the policy and by the organisation needed to fulfil it.

## **Arrangements (systems and procedures)**

It is vital to establish safe and healthy systems of work designed to counteract the identified risks within a business. The following aspects should be used as a guide when preparing arrangements for health and safety at work:

(a) The provision of health and safety performance criteria for articles, and product safety data for substances, prior to purchase.

(b) The provision of specific instructions for using machines, for maintaining safety systems, and for the control of health hazards.

(c) The development of specific health and safety training for all employees.

(d) The undertaking of medical examinations and biological monitoring.

(e) The provision of suitable protective equipment.

(f) The development and utilisation of permit-to-work systems.

(g) The provision of first-aid/emergency procedures, including aspects of fire safety/prevention.

(h) The provision of written procedures in respect of contractors and visitors.

(i) The formulation of written safe systems of work for use by all levels of management and workforce.

Other matters that might also be referred to include the arrangements for compliance with the Health and Safety (Display Screen Equipment) Regulations 1992, the Management of Health and Safety at Work Regulations 1992 Reg 3 (risk assessments), and the disciplinary measures consequent upon a breach of the policy.

## **Appendices to statements**

There are a number of reasons for incorporating appendices to statements of health and safety policy (although this is not a statutory requirement). For instance, there may be a need to detail the organisation's intentions, arrangements and procedures for dealing with a hazard specific to a process, e.g. the risk of back injury associated with a particular handling operation. It may be necessary to formally declare the company's policy on asbestos in existing buildings or on the provision of prescription lens eye protection to certain groups of operators. Fundamentally, an appendix qualifies in depth certain provisions outlined in the policy.

## **Policy monitoring**

Policy monitoring highlights four areas as follows:

(a) The accident and ill-health record.

- (b) The standards of compliance with legal requirements and codes of practice.
- (c) The extent to which organisations specify and achieve – within a given time scale – certain clearly defined objectives (of both short-term and long-term nature).
- (d) The extent of compliance with the 'organisation' and 'arrangements' parts of the organisation's own policy (discussed earlier), including in particular the written safe systems of work that have been developed by the organisation to meet its individual needs.

## **Plant Equipment and substances**

- Maintenance of equipment such as tools, ladders, etc.
- Are they in safe condition?
- Maintenance and proper use of safety equipment such as helmets, boots, goggles, respirators, etc.
- Maintenance and proper use of plant, machinery and guards.
- Regular testing and maintenance of lifts, hoists, cranes, pressure systems, boilers and other dangerous machinery, emergency repair work, and safe methods of doing it.
- Maintenance of electrical installations and equipment. Safe storage, handling and, where applicable, packaging, labelling and transport of dangerous substances.
- Controls on work involving harmful substances, such as lead and asbestos.
- The introduction of new plant, equipment or substances into the workplace – by examination, testing and consultation with the workforce.

### **(i) The statement of intent**

This involves a general statement of good intent, usually linked to a commitment to comply with relevant legislation. Many employers extend their policies so as to relate also to the health and safety of others affected by their activities. In order to demonstrate clearly that there is commitment at a high level, the statement should preferably be signed by the chairman, chief executive or someone in a similar position of seniority.

### **(ii) Organisational responsibilities**

It is vitally important that the responsibilities for putting the good intentions into practice are clearly identified. In a small organisation this may be relatively simple but larger employers should identify the responsibilities held by those at different levels in the management structure. Whilst reference to employees' responsibilities may be included, it should be emphasised that the law requires the employer's organisation to be detailed in writing. Types of responsibilities to be covered in the policy might include:

- Making adequate resources available to implement the policy;
- Setting health and safety objectives;
- Developing suitable procedures and safe systems;
- delegating specific responsibilities to others;
- monitoring the effectiveness of others in carrying out their responsibilities;
- monitoring standards within the workplace; and
- feeding concerns up through the organisation

### **(iii) Arrangements**

The policy need not contain all of the organisation's arrangements relating to health and safety but should contain information as to where they might be found, for example in a separate health and safety manual or within various procedural documents. Topics which may require detailed arrangements to be specified are:

- **Operational procedures relating to health and safety;**
- **Training;**
- **Personal protective equipment;**
- **Health and safety inspection programmes;**
- **Accident and incident investigation arrangements;**
- **Fire and other emergency procedures;**
- **First aid;**
- **Occupational health;**
- **Control of contractors and visitors;**
- **Consultation with employees; and**
- **Audits of health and safety arrangements.**

**Employees must be aware of the policy and, in particular, must understand the arrangements which affect them and what their own responsibilities might be. They may be given their own copy (for example, within an employee handbook) or the policy might be displayed around the workplace. With regard to some arrangements detailed briefings may be necessary, for example as part of induction training. Employers must revise their policies as often 'as may be appropriate'. Larger employers are likely to need to arrange for formal review and, where necessary, for revision to take place on a regular basis (e.g. by way of an ISO 9000 procedure). Dating of the policy document is an important part of this process.**