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Lewes District Council



Working in partnership with Eastbourne Homes

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Corporate Health and Safety Policy

1 General Statement

- 1.1 We, the Chief Executive Officer and Leaders of Lewes District and Eastbourne Borough Councils (referred to as 'the Councils' or 'LEC') are responsible for ensuring the highest standards of health, safety and welfare for all employees and others who may be affected by our activities.
- 1.2 Our Corporate Management Team (CMT) will lead the development, implementation and monitoring of a system that encourages a good safety culture. To achieve this, the Councils will adopt the HSE's safety management system 'HSG65' and the 'plan, do, check, act' cycle of continuous improvement.
- 1.3 Health and safety impacts will be considered alongside other business risks. Services and projects will be planned and designed to minimise the risks to the health and safety of employees and others who may be affected by our undertaking.
- 1.4 At LEC we fully recognise that people are our most valuable resource and therefore our moral obligation to create a safe and healthy working environment for our employees, contractors and those who interact with our services. We also recognise the financial benefits that good management of health and safety can bring to the Organisation, together with our legal obligations under the Health and Safety at Work Act and its associated legislation as a minimum standard of achievement.
- 1.5 Employees are empowered to bring health and safety concerns to the attention of managers who will take action to eliminate, minimise, or control them, as far as is reasonably practicable.
- 1.6 In order to meet our commitments, we will ensure that we will:
 - Plan work and projects that are compliant with legislation and approved codes of practice as a minimum standard.
 - Provide and maintain safe places of work where standards are regularly monitored by a system of planned inspections and where required remedial actions are implemented.
 - Make suitable and sufficient assessment of the risks posed by our activities and services and implement practical, robust, controls and safe working procedures to prevent harm.
 - Ensure the selection of safe equipment that is suitable for the work being carried out and implement a schedule of planned inspection and maintenance.
 - Ensure all accidents are thoroughly investigated and remedial actions identified and implemented.

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- Monitor accidents for trends and patterns that might signal a gap in safe working systems and controls.
 - Ensure suitable and appropriate levels of communication and consultation with our employees about matters that affect their safety and wellbeing.
 - Ensure systems are in place to provide suitable and sufficient information, instruction, training, and supervision.
 - Provide employees with the personal protective equipment necessary for their roles free of charge.
 - Ensure employees are competent to carry out delegated tasks by identifying training needs from risk assessments, providing training to an appropriate standard and ensure that training is refreshed regularly.
 - Employ competent employees to assist us in meeting our duty of care including, where appropriate, specialists from outside the organisation.
 - Ensure that health and safety is monitored by a system of inspections, checks, audits, and reports. Where gaps in compliance are identified an action plan will be put in place and monitored.
 - Put processes in place for responsible contractor selection, engagement, management, and monitoring.
 - Job roles will have clear health and safety responsibilities and through the recruitment process we will ensure the competence of those we employ. Where gaps in competence are identified we will arrange for appropriate training, supervision, and mentoring.
- 1.7 A report reviewing the health and safety management system will be presented to CMT on an annual basis, which will include information on any weaknesses identified during monitoring activities and an action plan for continual improvement that will be adopted and monitored by CMT.
- 1.8 This Policy will be regularly monitored through inspections, CMT reports and the Joint Safety Forum to ensure that the objectives are achieved. It will be reviewed and, if necessary, revised in the light of legislative or organisational changes. This Policy will be communicated to all persons working for, or on behalf of, Lewes District and Eastbourne Borough Councils, and made available to the public upon request.
- 1.9 A copy of this Statement will be displayed in suitable areas. The Policy will be reviewed on an annual basis and amended or added to as appropriate.
- 1.10 This Policy will cover all employees and will also apply to Councillors, agency employees, consultants, contractors, volunteers, and those working on behalf of the Councils.
- 1.11 This Policy takes immediate effect and replaces all previous versions. It will be reviewed annually, or more frequently if there is any change in the risk environment for the Councils, or in relevant legislation.

Signed:	Name and Role:	Date:
	Robert Cottrill Chief Executive	
	Cllr xxx Leader of EBC	
	Cllr xxx Leader of LDC	

2 Organisation and responsibilities

Lewes District and Eastbourne Borough Councils are committed to defining the roles of all staff, in order to help them meet their responsibilities within the health and safety management system effectively; and to adequately assess, control and monitor health and safety within the Councils.

The following responsibilities have been assigned for health and safety management within the LEC Health and Safety Management System. An outline of the organisational structure can be seen in Appendix 1. Detailed structure charts showing line management responsibilities can be found on The Hub or via the 'LEC Org Chart' desktop and Teams app.

2.1 Corporate Management Team

CMT is responsible for establishing strategies to implement policy and integrating these into the general activities of the Organisation, providing leadership to ensure the health, safety and welfare of all employees and other people affected by the Councils' activities. CMT will:

- Ensure the ongoing development, implementation, monitoring and review of the Lewes District and Eastbourne Borough Councils' Health and Safety Management System.
- Ensure there is a clear management structure with clearly defined responsibilities for implementing the Health and Safety Management System.
- Provide appropriate resources to ensure the ongoing development and implementation of the Health and Safety Management System.

- Set and agree corporate level plans for the delivery of the Health and Safety Management System.
- Review and further develop the General Statement of Health and Safety Policy and ancillary policies/guidance.
- Ensure health and safety performance is regularly reviewed and monitor the health and safety performance of their directorates.
- Integrate the health and safety policies and guidance into the general activities of the organisation.
- Ensure there are formal arrangements for the dissemination of appropriate health and safety information.
- Ensure there are arrangements to confirm the health and safety competency of all employees and contractors.
- Ensure the establishment of a proactive risk assessment system and the development and implementation of required risk control systems.
- Keep informed regarding relevant changes in health and safety legislation, standards, and good practice.

2.2 Senior Managers/Heads of Service

Senior Managers and Heads of Services are responsible for the strategic implementation of the relevant health and safety policies and procedures within their service area, developing them to fit the risks unique to their services where necessary. They will:

- Implement, monitor and review LEC's Health and Safety Management System in their individual services.
- Ensure the appointment of competent managers and team members to their services.
- Manage budgets to ensure resources are available for the management of health and safety and the protection of people from harm.
- Implement corporate level action plans in their individual services.
- Develop a risk profile for their service to maintain oversight of significant risks to health and safety.
- Ensure risk assessments are conducted, appropriate preventions are put in place, and that all who work under their remit are aware of the findings of any risk assessments and safe working procedures.
- Monitor managers and support them to implement the corporate procedures and processes within their areas of work.

2.3 Line Managers/Team Leaders

Line managers and team leaders are responsible for the implementation of all relevant health and safety policies and procedures, and the provision of the necessary resources and information to enable tasks to be carried out with risks being as low as reasonably practicable. They will:

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- Ensure risks arising from the workplace are assessed in consultation with their teams. Significant risks should be identified, recorded, and controlled.
- Comply with health and safety audits, and implement planned workplace inspections, risk assessment reviews and accident investigation activities.
- Work with the Property and Asset Management team to ensure that specific responsibilities in terms of building management and maintenance are implemented.
- Co-operate with the Health and Safety Manager and Joint Safety Forum in the implementation of assigned functions and activities.
- Ensure the active participation of their employees and relevant others in health and safety activities.
- Ensure employees (and contractors) are competent to carry out their assigned duties in a safe manner.
- Implement planned workplace inspections, risk assessment, COSHH assessment and safe systems of work reviews, and accident investigation activities.
- Report accidents, investigate causes and identify actions to prevent recurrence.

2.4 All Employees

All employees must take reasonable care of the health and safety of themselves and other people who may foreseeably be affected by their acts or omissions at work. They must:

- Co-operate with managers and relevant others to ensure duties and requirements are complied with to the required standard.
- Follow the mitigation actions in risk assessments, and safe working procedures together with instructions from their manager or team leader.
- Not intentionally, or recklessly, interfere with or misuse anything provided for the purpose of health, safety, and welfare.
- Use machinery, equipment, substances, transport, or other work equipment or safety device, in line with policies, instructions, training and supervision.
- To report accidents, near misses, dangerous occurrences, and verbal/physical assault incidents as soon as possible, and co-operate in their investigation in order to prevent a recurrence.
- Notify management of any work situation which has, or develops, the potential for serious danger to people.
- Report any building, equipment, or Personal Protective Equipment (PPE) defects as soon as possible to the relevant person (i.e. Property & Asset Management, Facilities or Manager).

2.5 Health and Safety Team

The Health and Safety team provides specialist advice (including interpretation of the law with implications for the Councils); and leads the co-ordination of health and safety across the Councils, working closely with managers to ensure compliance with all relevant legislation and policies.

The team:

- Provides specialist support and advice to managers and teams.
- Supports CMT to develop corporate level health and safety policies and procedures.
- Monitors accident reports and carries out high level accident investigations where serious injury or a near miss has occurred.
- Responds to health and safety concerns from both internal and external sources and those who raise concerns about Council services.
- Reviews performance throughout the Health and Safety Management System through inspections, audit, and the reviewing of policies and guidance.
- Reports monitoring outcomes to the Joint Safety Forum and CMT.
- Develops corporate health and safety guidance, resources, and training materials.
- Creates the annual health and safety report and action plan to present to CMT and the Joint Staff Advisory Committee for adoption.

2.6 Human Resources

HR provide advice and support on employee wellbeing, working closely with managers to ensure that the wellbeing and health of staff is looked after.

They are responsible for:

- Co-ordination of the occupational health contract and referrals
- Monitoring staff attendance and presenting management reports to CMT and the Joint Staff Advisory Committee
- Development and implementation of attendance management policy and procedures.
- Maintaining the Mental Health First Aider database and co-ordinating training.
- Co-ordination of the drug and alcohol policy and testing programme within it.

2.7 Property and Asset Management

The Property and Asset Management team is responsible for the property compliance of Council operational buildings (excluding residential properties falling under the control of Homes First and vacant properties under Neighbourhood First). The PAM team:

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- Ensures a regular programme of testing and maintenance including water hygiene, EICR, fire safety equipment including alarms, and EML.
- Co-ordinates and communicates with building 'responsible persons' on safety compliance matters.
- Where issues are found they develop and monitor an action plan for improvements.
- Develops and updates corporate policies relating to property compliance management.
- Monitors and manages asbestos management plans for relevant Council property.
- Arranges fire risk assessments and programmes remedial actions

2.8 Joint Safety Forum

The Joint Safety Forum is the Councils' consultative forum for health and safety. The Forum:

- Shares best practice and lessons learned from across the services to support continual improvement
- Reviews and monitors accident statistics
- Monitors the corporate action plan

2.9 Health and Safety Representatives

Unison is the Councils' recognised union; they may appoint or elect health and safety representatives to provide additional support and consultative functions with staff. Union-appointed safety representatives must be employees and will be given reasonable time and facilities to carry out their duties, which are:

- Attendance at the Joint Safety Forum
- Acting on behalf of all members and other employees during consultations on health and safety matters.
- Represent staffing when HSE or local authorities consult them
- Investigating accidents, near misses, and other potential hazards in the workplace.
- Investigating complaints made by an employee about health, safety, or welfare in the workplace
- Presenting the findings of the investigation to managers, the Health and Safety team or CMT.
- Inspect the workplace
- Supporting managers and the Health and Safety team with accident investigations, inspections, and other monitoring activities.
- Attending union-arranged training courses (for which they will be given paid time off to attend).

- Supporting staff during interviews for accident investigations

2.10 Representatives of Employee Safety

Non-union safety representatives who are elected by the workforce to represent them on health and safety matters. RES will be given training by the Councils to enable them to carry out their duties, which are:

- Representing staff on general health and safety matters, potential hazards, and dangers.
- Meeting with health and safety inspectors from the HSE or the local authority.
- Attending training courses to support them in their duties
- Supporting managers and the Health and Safety team with accident investigations, inspections, and other monitoring activities.

2.11 Joint Staff Advisory Committee (JSAC)

The JSAC is made up of Councillors, staff and union representatives whose purpose is to act as an internal advisory committee. The Committee:

- Considers and comments on policies relating to the application of new legislation and equality issues.
- Considers matters of health, safety and welfare of staff which are referred to the Committee for comment.
- Makes recommendations to Full Council, Cabinet, or Chief Executive Officer.

3 Arrangements for health and safety

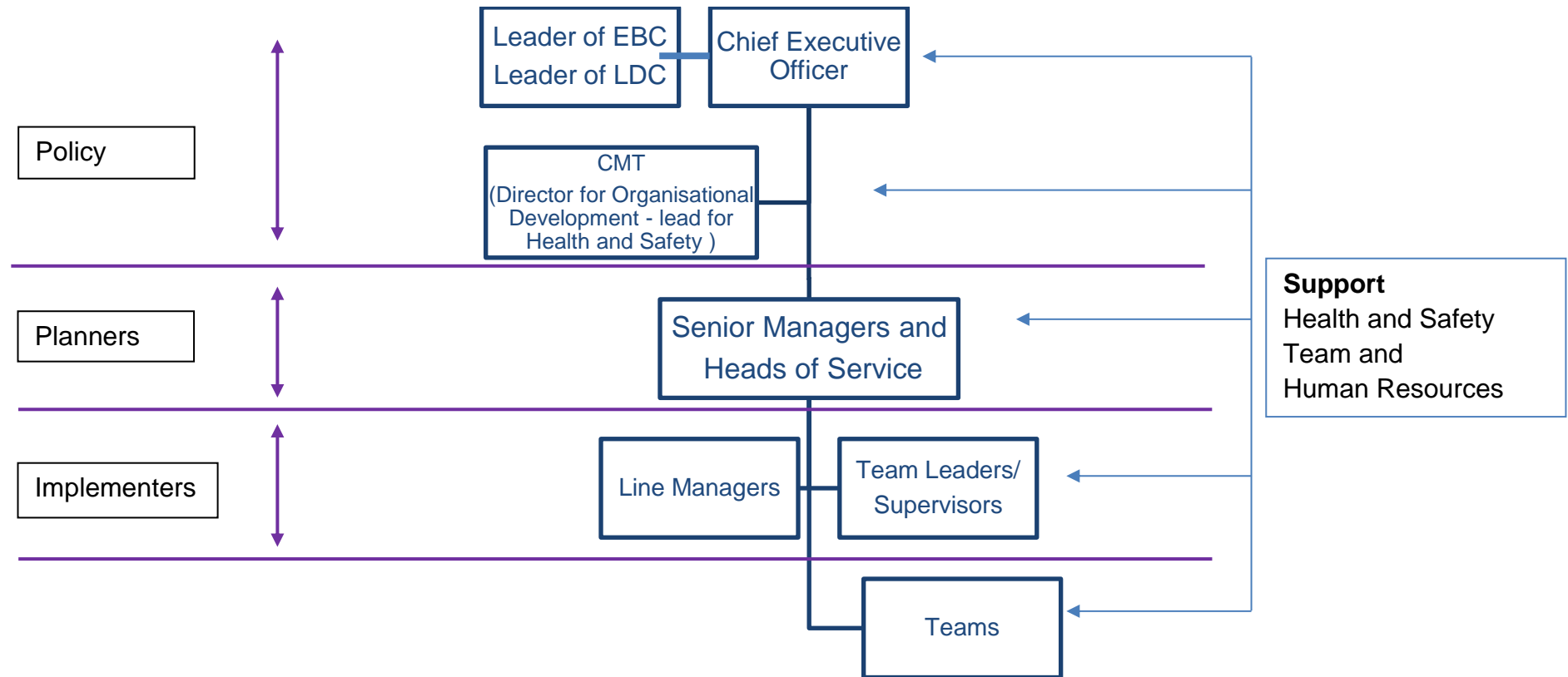
General arrangements for health and safety can be found in the guidance available on [Health and Safety Central](#) in Teams and also [The Hub](#). Individual services are to use this guidance to inform their service-specific arrangements for safety. An index of guidance and policies are listed below.

For advice on any of the information contained in this policy document, or to raise safety concerns, please contact health&safety@lewes-eastbourne.gov.uk

Index of policy and guidance documents

Topic	Type	Owner	Location
Accident Reporting	Guidance	Health and Safety	H&S Central
Incident Investigation	Guidance	Health and Safety	H&S Central
Asbestos Management	Policy	Property & Asset Management	The Hub
Biological Hazards	Guidance	Health and Safety	H&S Central
Hazardous Substances	Guidance	Health and Safety	H&S Central
Display Screen Equipment	Guidance	Health and Safety	H&S Central
Driving for Work	Guidance	Health and Safety	H&S Central
Drugs and Alcohol	Policy	Human Resources	The Hub
Electrical Testing	Policy	Property & Asset Management	The Hub
Fire	Policy	Property & Asset Management	The Hub
First Aid at Work	Guidance	Health and Safety	H&S Central
Control of Legionella	Guidance	Health and Safety	H&S Central
Lone Working	Guidance	Health and Safety	H&S Central
Manual Handling	Guidance	Health and Safety	H&S Central
Noise	Guidance	Health and Safety	H&S Central
Personal Protective Equipment	Guidance	Health and Safety	H&S Central
Risk Assessment	Guidance	Health and Safety	H&S Central
Slips, Trips, and Falls	Guidance	Health and Safety	H&S Central
Stress Management	Guidance	Health and Safety	H&S Central
Work Equipment	Guidance	Health and Safety	H&S Central
Working at Height	Guidance	Health and Safety	H&S Central
Workplace Welfare	Guidance	Health and Safety	H&S Central

Appendix 1: Organisational arrangements for health and safety



Appendix 1

	Issue	Action	Owner	Timeline	Updates
1	Leadership				
1.1	Health and safety in the organisation has a low profile. 40% of staff did not think that it was a priority for the organisation.	<p>Detailed review of the Health and Safety Policy to ensure it is meaningful and relevant:</p> <ul style="list-style-type: none"> - Clearly set out responsibilities of upper tiers of the organisation - Clearly highlight the Joint Safety Forum (JSF) in the Policy and its function - Index detailing all the arrangements for health and safety. 	<p>Health & Safety Manager (HSM)</p> <p>CMT: Becky Cooke (BC)</p>	<p>June 2023 – pushed back due to elections and possible changes in leadership.</p> <p>Draft to go to CMT in April and JSF in May for comment ahead of Joint Staff Advisory Committee 10 June.</p>	<p>07/02/23: Review in progress for approval after elections.</p> <p>17/03/23: updated timeline agreed.</p>
1.2		<p>Develop a process for producing Health & Safety Policy and documentation:</p> <ul style="list-style-type: none"> - Contributors - Sign off - Distribution - Training 	<p>Health & Safety Manager</p> <p>CMT: BC</p>		<p>17/03/23: Decide on what is policy and what is guidance to enable process/plan to be developed.</p>
1.3		<p>Produce a manager’s handbook for low-medium risk areas to disseminate the information in the policy in an easy to read format.</p>	<p>Health & Safety Manager</p> <p>CMT: BC</p>	<p>April 2023</p>	<p>7/02/23: In progress Plan to release to managers.</p> <p>17/03/23: Handbook sent to BC - communications plan to be agreed.</p>
1.4	<p>Staff did not know:</p> <ul style="list-style-type: none"> - Which member of CMT is the lead for health and safety - How to contact the H&S team 	<p>Create Sharepoint Site/team to include all Health and Safety Information. Include:</p> <ul style="list-style-type: none"> - How to report health and safety concerns - Information on H&S Team and CMT lead 	<p>Health & Safety Manager</p> <p>CMT: BC</p>	<p>January 2023</p>	<p>22/12/22: Site created and populated with resources – launch in January 2023</p> <p>03/02/23: Launched -</p>

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	Issue	Action	Owner	Timeline	Updates
	- Where to find H&S information				Announcement in next Hub news. Completed
1.5		Develop a communication sharing procedure for health and safety information: - Channels - Checks	Health & Safety Manager CMT: BC		17/03/23: Communications plan to be agreed.
1.6		Write and send out a bulletin introducing corporate health and safety functions: - CMT lead - H&S team - How to report concerns - How to find information	Health & Safety Manager CMT: BC	January 2023	22/12/22: In progress – on schedule for launch in January. 03/02/23: to appear in next Hub news. Completed
1.7	Lack of oversight/strategic management	Develop an annual health and safety report.	Health & Safety Manager CMT: BC	October 2023	
1.8	CMT not fully aware of risks	Create a register of health and safety risks for each service area.	Heads of Service CMT: All	October 2023	Also reviewing how actions are presented to CMT and monitored.
1.9	Joint Safety Forum is management heavy	Nominated representatives for each service area (or elected if enough interest)	Heads of Service, supported by HSM and Joint Safety Forum CMT: BC	May 2023	17/03/23: Set up meeting for BC/BH/SA to discuss membership and objectives of JSF.

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	Issue	Action	Owner	Timeline	Updates
1.10		Safety Forum to set objectives for health and safety management and be involved in: <ul style="list-style-type: none"> - Developing and signing off H&S guidance - Monitoring activities and analysing the results of monitoring 	Joint Safety Forum supported by HSM CMT: BC	October 2023	17/03/23: As above
1.11	Demands on staff and their workloads are not adequately controlled	CMT and Senior Managers' Forum to review controls	CMT Senior Managers		Action plan from staff survey
1.12	The outcomes of change management are not adequately communicated or understood by staff.	CMT and Senior Managers' Forum to review process	CMT Senior Managers		17/03/2023: Internal comms strategy to be agreed.
2	Management of Health and Safety				
2.1	<ul style="list-style-type: none"> • Managers not sharing corporate information with teams • Managers/Senior Managers not fully aware of their H&S responsibilities • Not all hazards fully assessed • Not all necessary documentation in place 	Create a checklist for managers to use to ensure they have covered all the essential H&S requirements with their teams Manager's handbook	Health & Safety Manager CMT: BC	January 2023 April 2023 launch	22/12/22: In progress for completion in January. 7/2/23: Completed – launch through Senior Managers' Forum (SMF) in April.

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	Issue	Action	Owner	Timeline	Updates
2.2		<p>Training on managers responsibilities</p> <p>Risk Assessment:</p> <ul style="list-style-type: none"> - Training needs to be highlighted in risk assessments - Add training section to template 	<p>Health & Safety Manager to develop</p> <p>Senior Managers to monitor</p> <p>CMT: All</p>	January/February 2023	<p>22/12/22: Training for Tourism managers completed. Second session due in January. Wash up session completed in March.</p> <p>OLLE training to be rolled out</p>
2.3	Monitoring is reactive not proactive	<p>Encourage more proactive monitoring activities</p> <ul style="list-style-type: none"> - Safety tours - Inspections by managers/supervisors - Staff surveys to be conducted regularly to gauge what is filtering down. 	<p>Health & Safety Manager to promote with support from Senior Managers and CMT</p> <p>CMT: All</p>	June 2023	17/03/23: Aim for CMT to visit sites a couple of times a year.
2.4	<p>Roles and responsibilities of different departments are not always understood by others.</p> <p>This often occurs in the management of buildings with grey areas between operational management, Facilities, and corporate landlord.</p>	CMT and Senior Managers to identify ways to improve clarity in roles and responsibilities.	CMT and Senior Manager's Forum		17/03/23: Interdepartmental communications were also identified as an issue in the recent peer review.
3	Competence				

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	Issue	Action	Owner	Timeline	Updates
3.1	<ul style="list-style-type: none"> • Training is not refreshed regularly • Managers do not keep a record of staff training 	New Health and Safety package for OLLE	Health & Safety team to roll out with support of Managers	2023	New/updated courses to be released on a rolling basis
3.2		Review the corporate training guidance document - make managers responsibilities clear.	Health & Safety and HR	June 2023	17/03/23: BC will discuss with Helen Knight
3.3		Review the induction process to ensure health and safety information is adequate.	Health & Safety and HR	June 2023	17/03/23: BC will discuss with Helen Knight
3.4		Managers training and education on importance of keeping records of training and organising regular refresher training.	Senior Managers	July 2023	Included in Manager's handbook
3.5		Training for different job roles should be identified and used in recruitment and performance management/development of those roles.	Senior Managers CMT: All		
3.6		Share the outcomes of accident investigations – where appropriate with the wider organisation.	Health & Safety Team through Joint Safety Forum	Ongoing	Now included in H&S report and accident report for JSAC. Completed
4	Consultation and involvement				
4.1	Teams may not be provided with up to date information on procedures and safe ways of working	<p>Improve the way health and safety information is shared and made accessible.</p> <p>On a service level, managers should ensure procedures are reviewed</p>	<p>Health & Safety Team with the support of JSF and Managers</p> <p>CMT: All</p>	<p>May 2023</p> <p>December 2023</p>	Health and Safety Central launched

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	Issue	Action	Owner	Timeline	Updates
		regularly and teams updated when there are changes. Devise a system to monitor centrally?			
4.2	With the exception of Waste and Recycling, there are no representatives of employee safety or union-appointed safety representatives	Encourage each service to nominate a staff representative of employee safety	Joint Safety Forum	May 2023	
4.3	Nearly half of staff said that health and safety was not a regular topic of discussion at team meetings.	Encourage managers to include health and safety as a standing item on meeting agendas. Educate managers to see welfare issues as health and safety related.	Senior Managers	May 2023	In Manager's handbook. Bulletin went out in February Hub news reminding managers of their responsibilities.