

HSP1 - Corporate Health, Safety and Wellbeing Policy

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INTRODUCTION

As an employer, the City of London Corporation is required by the Health and Safety at Work Act etc. 1974 to prepare a written statement of its general policy with respect to Health and Safety as to how it will fulfil its general duties as an employer:

- (a) the provision and maintenance of plant and systems of work that are, so far as is reasonably practicable, safe and without risks to health;
- (b) arrangements for ensuring, so far as is reasonably practicable, safety and absence of risks to health in connection with the use, handling, storage and transport of articles and substances;
- (c) the provision of such information, instruction, training and supervision as is necessary to ensure, so far as is reasonably practicable, the health and safety at work of employees;
- (d) so far as is reasonably practicable as regards any place of work under the employer's control, the maintenance of it in a condition that is safe and without risks to health and the provision and maintenance of means of access to and egress from it that are safe and without such risks;
- (e) the provision and maintenance of a working environment for employees that is, so far as is reasonably practicable, safe, without risks to health, and adequate as regards facilities and arrangements for their welfare at work.

Our policy includes details about the organisation and arrangements for carrying out the policy and must be brought to the attention of all employees. As a responsible employer, we go beyond the minimum legal obligations to support and encourage our employees to be healthy and resilient individuals. The Corporation has chosen to adopt a holistic and proactive approach to workplace health, safety and wellbeing, by adopting preventative measures; this enables us to safeguard the physical health and mental wellbeing of our employees.

This document has been prepared to meet these legal requirements. This policy does not contain specific procedural instructions. To check for current corporate guidance, refer to the Health Safety and Wellbeing pages (People & Property) on the intranet. Departmental arrangements must be prepared locally as necessary to deal with specific issues using the corporate framework facilitated by this Policy.

Everything we do supports delivery of our Corporate Plan (2018 – 2023) where our top-level outcomes include *contributing to a flourishing society* where *people are safe and feel safe* and *people enjoy good health and wellbeing*.

SAFETY

POLICY STATEMENT



Safety isn't separate from our business. It's central to everything we do. Each and every one of us must put safety at the heart of what we do in delivering our excellent services. If we do this together, we can all keep the City working safely, for our visitors and our workforce.

Putting safety at the centre of everything does not mean placing obstacles in the way of progress; it's more about the behaviour displayed by our staff in discharging their responsibilities.

Being open and honest

We all have a duty to report and share information. It's not just accidents and emergencies that need to be recorded, but also those close calls or near misses. Getting that feedback means we will learn and hopefully prevent any accidents and let us get better at what we do.

Let's understand what went wrong, why it went wrong, and how we can make improvements.

Working with others

Although I maintain ultimate responsibility, I have delegated duties to the Chief Officers to ensure that they have their own Departmental Management Systems and Policies bespoke and risk profiled to their services, which; will detail their commitment and arrangements as necessary, identify specific targets and provide a measure of monitoring to gauge their performance.

Safety isn't just a personal responsibility, our managers, our health and safety coordinators, the trade unions and external partners such as contractors and suppliers, all have a critical role in delivering safety.

Embracing safety

It can be easy for people to see safety as getting in the way and slowing us down.

The truth is that working safely improves productivity, efficiency and can often deliver substantial savings. This alone should align our business objectives to ensure safety is used to drive and deliver savings and preventing waste

Communicating clearly

As a unique and complex organisation we need to make sure that people understand what they need to do to stay safe, and so, our processes, safe systems of work and basic rules are much more likely to be remembered and adhered to if they are presented in a clear and uncomplicated way.

Trust your instincts

If something doesn't feel safe, the chances are it's not. So, don't do it, stop the job and speak up. If you see others doing something that feels risky, stop them and report it. Short cuts are often when accidents happen. So don't take them

I don't believe in a blame culture within the City of London Corporation. I do believe, however, that only by working as a team, with people taking responsibility, pride and acting professionally in their roles, to ensure they work safely, will we be able to foster a positive safety culture across the City of London Corporation

Signed:



John Barradell
Chief Executive & Town Clerk

1. POLICY PURPOSE & SCOPE

This policy, in conjunction with other corporate, departmental documents and procedures, provides direction on the management of Health Safety and Wellbeing across the City Corporation and how to fulfil your own health, safety and wellbeing responsibilities.

Corporate Health, Safety and Wellbeing Policy

Overarching policy on specific health, safety and wellbeing issues (Corporate Risks) and corporate cross cutting issues



Departmental Health and Safety Plan

Policy of the Departmental Chief Officers' commitment and expectation for the Health, Safety and Wellbeing in their departments

A Departmental plan or framework for managing Health, Safety and Wellbeing including, organisation of resources and arrangements for actively managing health and safety along with procedures as required that form a HSMS (Health & Safety Management System) and include Annual Certificate of Assurance (ACA) and Top X / Risk Profiling process.



Divisional/Team/Section Documents

(as applicable)

Risk Registers
Risk Assessments
- (COSHH, DSE as applicable)
Training Needs Analysis
Training Records
Top X / Risk Profiling
Safe Systems of Work

Accident/Incidents Investigations
Local Monitoring (Inspections/Audits)
Minutes from H&S Communications
- (team meetings/groups/committees)
Personal Protective Equipment logs
Daily/Weekly/Statutory record checks
- (as applies to equipment e.g. Fork lift trucks)

Procedures Statutory Checks & Inspections

Permits (to work/access records)

The fundamental aim of this policy is to ensure the health, safety and wellbeing of our employees, service users, visitors and contractors involved in the delivery of our services.

Application of Policy

This policy applies to all Corporation of London Corporation workers including; Members, City of London Police, our independent schools, agency staff, casuals, volunteers and others working for or on behalf of the Corporation, such as contractors.

This policy does not apply to City of London Multi-Academies Trust and the other 'family' of schools (**Appendix 1**).

The City Corporation recognises and accepts the duties and responsibilities placed on it as an employer by the Health and Safety at Work Act etc.1974.

As an organisation providing a wide range of public/private services, we acknowledge our duties not only to employees but also to others who are affected by our activities. We acknowledge that no activity is so important or urgent enough to compromise health, safety and wellbeing.

Anyone working on the City's behalf on any of our sites, paid or unpaid, must be advised orally, contractually or otherwise that they must have regard to health and safety and exercise all care so as to eliminate or suitably control hazards and reduce risks to themselves and others.

The City Corporation is committed to meeting its statutory obligations and has a responsibility, as far as is reasonably practicable to:

- Provide and maintain safe and healthy working conditions, taking account of any statutory requirements
- Ensure that the adequate resources are made available by the City Corporation and its partners to meet the requirements of this policy
- Assess the risks to the health, safety and welfare of employees and visitors whilst they
 are on City Corporation premises and to maintain a record of all risk assessments
 carried out as required under the Management of Health and Safety at Work
 Regulations 1999
- Adopt a systematic approach to safety that identifies priorities and sets objectives whereby risks are eliminated or minimised, so far as reasonably practicable, by the correct selection and design of facilities, equipment and processes
- Provide information, operational policies and procedures, training, instruction and supervision to enable employees to perform their work safely and efficiently
- Maintain a constant and continuing interest in health, safety and welfare matters, consulting and involving employees or their representatives wherever possible
- Undertake Sensible Risk Management as recommended by the Health and Safety Executive (HSE)
- Adopt a proactive approach to wellbeing to further reduce sickness absence and presenteeism levels

 Continue to undertake analysis into the success of wellbeing interventions to track a return in higher levels of engagement and productivity of our employees

Control of Safety Policies

An important element in governance and compliance with Health and Safety legislation is a consistent approach to the development and control of policies. This policy aims to ensure a consistent and evidence based process for the development, ratification and distribution of strategies, policies, procedures and guidance. Departments must have regard to the procedure document - HSPR4 Developing and Implementing Safety Policies and Procedures when formulating any Safety Policy, Procedure or Guidance document.

2. RESPONSIBILITIES

The <u>City Corporation Health & Safety Management Arrangements</u> at Appendix 2 are based on the HSG 65 model as published by the HSE. It identifies tasks, processes and responsibilities at each stage of the safety management model.

The <u>Consultation and Communication Flowchart</u> at Appendix 3 demonstrates how information on safety is shared up and down the organisation at different levels, how systems integrate and assurance on these are provided to employee representatives senior managers and Members.

The City of London recognises that as an employer we have a responsibility and duty of care for physical health and mental wellbeing in the workplace, however all employees have an obligation to take reasonable care of their own personal health and wellbeing.

2.1 Members & Committees

Members and other nominated parties acting on Committees play a crucial strategic role at the City Corporation. It is important to demonstrate leadership and commitment to improving health, safety and wellbeing performance and to verify effective application of strategic health and safety governance in the discharging of their duties.

Members of City Corporation Committees are expected to ensure that health safety and wellbeing is adequately considered when making decisions at a strategic level and thereby can demonstrate clear, visible leadership and accountability for the health and safety aspects of their services and activities covered by their Committees.

2.2 Town Clerk & Chief Executive

The Town Clerk will ensure that all appropriate mechanisms are in place for this policy to be applied across the City Corporation.

The Town Clerk will: -

- Provide leadership to ensure good standards of health and safety performance
- Ensure the provision of competent health and safety advice
- Ensure adequate resources are available for health and safety (such as the delivery of training, provision of systems and procedures), as necessary

- Ensure that the organisation and arrangements for carrying out the City's health safety and wellbeing policy and other statutory requirements are adequate
- Determine and periodically review City Corporation wide targets in respect of health and safety
- Chair a strategic corporate Health, Safety and Wellbeing Committee whose specific responsibility is to lead, deliver and coordinate our vision for a safe, secure and healthy workforce.

2.3 Chief Officers

Chief Officers are ultimately responsible for ensuring the implementation of corporate and departmental policies within their departments.

Chief Officers/Headteacher shall:

- Through leadership and personal example, foster positive attitudes towards health, safety, welfare and security throughout their departments so that their beliefs and commitment to health and safety become the shared values of all employees.
- Ensure that a departmental policy is in place and is regularly reviewed that gives details about the organisation of resources and safety arrangements for their department in order to support health, safety and welfare management.
- Ensure that health and safety plans are in place;
 - management teams know and fulfil their individual responsibilities regarding health and safety.
 - that they receive relevant information, instruction and training so they are competent to carry out the health and safety tasks assigned to them.
- Ensure the implementation of effective safety management systems within their department
- Ensure that there are designated departmental safety managers and other competent persons within their department with clear responsibilities for health and safety coordination and that they monitor the degree to which these responsibilities are met by managers.
- Oversee health and safety performance in their areas of responsibility through the development of appropriate Key Performance Indicators (KPIs) and actively contribute to achieving the City Corporation's overall health safety and wellbeing strategic aims and KPIs.
- Ensure that operational health and safety matters are regularly discussed and addressed within each of their Management Teams.
- Form an appropriate safety working group for the discussion of specific departmental issues on safety; see point 3.5, Departmental Health and Safety Groups / Committees
- Give effect to mechanisms for the proactive monitoring of safety systems and control measures through an appropriate inspection and audit programme to enable the annual assurance process.

- Ensure the relevant department is adequately represented at the strategic Corporate Health Safety and Wellbeing Committee as necessary and ensure minutes are read, actioned and communicated to staff as necessary.
- Identify and agree clear responsibilities for building management issues where:
 - a building is occupied by more than one department,
 - services are received from other Chief Officers; or
 - the department is spread over various sites i.e. fire risk assessment, first aid provision etc

Where more than one Chief Officer is responsible for managing a site or building it must be agreed which Chief Officer will lead on building management issues and have primary responsibility for the asset.

 Set annual targets for health and safety performance within their departments in support of the City Corporation's strategic aims.

The result of the annual audit will be summarised into an Annual Certificate of Assurance (ACA), which will be provided to the Corporate Health Safety and Wellbeing Committee as necessary.

2.4 Managers

All managers within their departments are responsible for ensuring that activities carried out under their control are conducted safely and in accordance with relevant safety legislation, safety policies and their local procedures. Some of these responsibilities may be delegated to section heads, supervisors or team leaders, as appropriate.

Delegation does not remove responsibility and Senior Managers need to check periodically that the responsibilities are being discharged.

Managers at all levels have a role in safety management and as such managers are required to review the responsibilities that may apply to them, these can be seen in more detail in the document "HSG20 - Guidance for Managers on Health & Safety compliance".

All managers must complete the following training courses; Managing Health and Safety Briefing or e-Learning equivalent, and Mental Health Awareness for managers.

Managers are responsible for setting an example and promoting health safety and wellbeing best practice in the workplace in accordance with the City Corporation's Equality and Inclusion values; helping to build a work environment which is healthy, inclusive and ensures equality of opportunity.

2.5 Departmental Safety Managers

Each department must nominate an appropriate officer to act as the Departmental Safety Manager. They will act as coordinators for their department on health and safety matters. It is not their job to do health and safety for their department but to facilitate and monitor compliance for the department through the appropriate provision of information, instruction and training for managers to ensure health and safety is assured.

They will assure that local safety management systems are in place as directed by the Chief Officer.

They will provide a conduit and key single point of contact between the Corporate Health, Safety and Wellbeing Team for key safety information exchange including-

- Policy creation and Guidance consultation
- Accident/Incident Reporting and Investigation
- Safety specific training procurement
- Local Compliance (Inspection & Auditing)
- Top X / Risk Profiling submissions
- Annual Certificate of Assurance (ACA) submission

They must be competent in accordance with the risk profile of their department.

Departmental Safety Managers must also attend the Departmental Safety Managers Forum (DSMF) as agreed in its Terms of Reference.

2.6 Corporate Health, Safety and Wellbeing Teams

The Corporate Health, Safety and Wellbeing team constitutes the City Corporation's competent advisor as required under *Regulation 7 of the Management of Health and Safety at Work Regulations 1999*. It provides advice corporately on Health and Safety.

The team will as part of its function provide the auditing and monitoring function to provide assurance to the Town Clerk and Chief Officers on compliance with our safety management systems and therefore safety legislation across the City Corporation. It will report on compliance and monitor performance corporately using the relevant safety performance indicators.

The Corporate Health & Safety Manager (Property) and Head of Health Safety and Wellbeing are appointed as the "Competent Persons" for the City Corporation to assist in development of a strategy for Health & Safety, provide advice, inform and assist any employee or department within the City Corporation.

Justin Tyas – Health, Safety and Wellbeing Manager (People) Peter Dempsey - Health & Safety Manager (Property)

Appropriately, authorised officers within the health and safety section will:

- have access to all areas and carry out planned and unannounced inspections and audits within any area of the City Corporation and be afforded the maximum cooperation by all managers in relevant departments as is necessary.
- have the appropriate authority to make safe or stop any works being carried out by, for or on behalf of the City Corporation or on City Corporation property, until such risks are adequately controlled, where a serious danger or risk is identified or suspected.
- Produce health safety and wellbeing performance reports for the Chief Officer Group, Corporate Safety Committee and others as required.

 Act as principal liaison with the Health and Safety Executive, Police & Fire Service in relation to health and safety related matters occurring in corporate buildings and other appropriate enforcement authorities as necessary.

2.7 Facilities Managers / Premises Controllers

Facilities Managers are those officers, designated by relevant Chief Officers to carry out the following duties and responsibilities:

- Monitor and assess the safe condition of the fabric and structure of buildings and to seek, where necessary, specialist professional/technical advice from other City Corporation departments and take remedial action as necessary.
- To ensure, for buildings in multiple occupancy, that appropriate consultation is carried out with users on health and safety issues affecting all aspects of use of the building including changes to the structure, occupancy and fabric of the building.
- To specifically draw up and revise as necessary, risk assessments for common areas in the building and to co-ordinate the assessment of other hazards that impact on health, safety or security of the building or occupants.
- To hold and maintain an up to date and appropriate premises health and safety file which may include, copies of risk assessments, any asbestos registers / management plans and appropriate evidence of monitoring and inspections e.g. water temperature checks to support Legionella control, etc.
- To coordinate arrangements in the building for dealing with emergencies including fire and mass evacuations to safeguard occupants and others who could be harmed.
- To bring to the attention of any person that may carry out work on the fabric or fixture and fittings of the building any known hazards. For example, through the provision of any asbestos management plan or any other controls in place for potentially hazardous work areas such as Permits to Work or for high risk processes such as Hot Works Permits.
- To bring to the attention of the appropriate senior manager matters outside their control or competence but which have implication for the continuing safety and integrity of the building or its use.
- To coordinate and monitor any works undertaken by contractors. All such works are deemed to form part of the City of London Corporation's undertakings.

2.8 Employees

All employees have a legal obligation to take reasonable care for their own health and safety and for that of others (e.g. volunteers) and to co-operate with respect to health and safety matters. In addition, all employees must:

- Work safely and efficiently without endangering their own health and safety, and that of their colleagues and any other person who may be affected by their acts and omissions.
- Ensure that they understand the health and safety rules and procedures that apply to their work and that they follow any safety instructions issued by their Supervisor, Team Leader or Manager.
- Staff are expected to adhere to other policies and guidance on safe systems of work such as the drug and alcohol misuse policy and any local Health and Safety procedures.
- Not recklessly interfere with or misuse any equipment or systems intended for ensuring health and safety.
- Attend health and safety training as required, and actively put it into practice the learning from this training.
- Advise their Line Manager of any additional or unmet training needs, deficiencies in safe working systems, faults or hazards in their working environment.
- Report any accidents, incidents, near misses or hazardous situations; including violence and aggression to a manager as soon as possible after the incident. Staff must fully cooperate as required in any subsequent investigation and provide all facts as necessary to the investigating officer.
- Not bring into the workplace without the appropriate authority any tool, substance or piece of equipment of their own which is potentially hazardous to their health and safety and that of others.
- Be aware of the emergency evacuation procedures, positions of fire alarms, equipment and exits and know who the Local Fire/Safety Marshall and First Aider are for the area where they are working, and who to contact in an emergency.

2.9 Union Safety Representatives

In order to comply with the Safety Representatives and Safety Committee Regulations 1977 (as amended) and the Health & Safety (Consultation with Employees) Regulations 1996, each recognised union must notify the City Corporation in writing of the appointment of any employee as a Safety Representative. The main responsibilities of a safety representative are:

- To investigate significant hazards and dangerous occurrences to determine the root cause of accidents and investigate complaints by any person they represent relating to that person's health, safety or welfare and attend health and safety meetings where appropriate to ensure their members are effectively represented.
- To carry out inspections of the workplace at agreed intervals having given reasonable notice to the responsible manager.

- To receive information from the Corporate Health, Safety and Wellbeing Team, Health and Safety Inspectors and others on behalf of employees whose health and safety they represent and to make representations to the appropriate Senior Manager on matters arising from the above duties.
- The City Corporation provides a Corporate Health, Safety and Wellbeing Committee that discusses corporate issues, disseminates information and monitors performance. The Unions may each nominate an attendee. Terms of Reference can be viewed upon request to the Head of Health, Safety and Wellbeing.

2.10 Disciplinary Action

Failure to follow safe working practices and instructions or fulfil responsibilities is a serious matter and may lead to disciplinary action up to and including dismissal.

3. ORGANISATIONAL ARRANGEMENTS

3.1 Departmental Health and Safety Policy

There is no requirement to develop a local Health and Safety Policy. A short statement of commitment / intent from the Chief Officer should suffice simply to provide:

- a link between the corporately laid down responsibilities and what will be expected in local practice departmentally
- senior commitment to managing health and safety within the department.

These can often form part of the Health & Safety Plans as shown below as a simple statement or precis to the plan.

3.2 Health and Safety Plans

All departments are required to develop and implement their own departmental health, safety and wellbeing plans. The departmental plan is not intended to duplicate existing or proposed corporate policy statements, procedures or codes of practice

This key document will establish a structure for managing health and safety within the department, highlighting arrangements within each division.

Plans detail how health, safety and wellbeing is managed and organised in each department. It shall identify named individuals with specific health and safety responsibilities, and the systems in place for securing health and safety at a local level. It must be tailored to meet the needs of a division taking into consideration the nature of work and associated risks. It also secures ownership and accountability. It will form a key part of the Health and Safety Management system and shall remain a live document.

More information can be found on Health & Safety Plans on the intranet.

3.3 Safety Risk Management

The City Corporation manages its Health and Safety risks proactively through a system of risk assessments and 'Top X' / risk profiling and reporting. A full explanation of this is in

the guidance notes "Risk Assessment Guidance" and "Top X / Risk Profiling Guidance" on the intranet.

Pentana is the Corporate Risk Management Information System. Departments must maintain their Top X / risk profiling registers on Pentana. Top X risks will be constantly reviewed by the Corporate Health & Safety Team and where appropriate discussed at the Corporate Health, Safety and Wellbeing Committee meetings.

3.4 Assurance

Local Assurance

It will be the responsibility of local managers to monitor their day-to-day performance with regard to health and safety including regular monitoring and compliance and review of their risk assessments, the investigation of accidents and near misses as appropriate, identifying those at risk with regard to health issues, maintaining records, and reporting to local health and safety committees.

Departmental Assurance

It will be the responsibility of Chief Officers to provide adequate mechanisms for the proactive monitoring of safety performance including an inspection programme and annual assurance programme.

The result of the annual audit will be summarised into an Annual Certificate of Assurance, which will be reviewed as necessary by the Health Safety & Wellbeing Committee and the Town Clerk. Details of the assurance process can be found on the intranet under the ACA, Annual Certificate of Assurance Procedure.

Corporate Assurance

Refer to Paragraph 2.8, Role of the Corporate Health Safety and Wellbeing Teams.

3.5 Departmental Health, Safety and Wellbeing Groups / Committees

Each department as part of its arrangements for safety management will form a Departmental Safety Group/Committee. Health and safety management, performance and issues affecting that department should be discussed within this framework.

- It is expected the group is chaired by a Senior Manager of the department or Chief Officer as appropriate
- It is expected these groups will meet as necessary in accordance to the departmental risk profile, but at least twice a year
- Minutes will be published on the intranet and made available to all staff
- Agendas for the meeting must be appropriate with regards to the departments work or risk profile
- Accidents and incidents statistics will be monitored by this group and reviewed as necessary to ensure departmental learning and prevention of recurrence
- The Health, Safety and Wellbeing Manager (or their representative) will be invited to all groups and will attend as necessary to provide central updates on health and safety matters or facilitate information sharing and corporate learning

A suggested structure for this group and the interaction of any safety sub groups is available via this link: Suggested H&S Group / Committee Structure

3.6 Corporate Health, Safety and Wellbeing Committee

The Corporate Health, Safety and Wellbeing Committee is a Chief Officer-led committee whose function is to advise and make recommendations to the City Corporation's Chief Officer Group on matters relating to the overall management of health, safety and wellbeing throughout the organisation.

The Committee shall meet quarterly. Special meetings to discuss matters of urgency may be agreed by the Chair (Town Clerk).

The Committee may delegate appropriate business to managers and/or departmental safety committees/groups and can require reports of any outcomes.

The Committee will also receive reports on the meetings of the departmental safety committees / groups or other meetings where safety issues have been discussed, to ensure corporate oversight and dissemination of issues raised within one service area or externally, where these may have implications for other City Corporation service areas.

The committee will help to:

- Raise the profile of health, safety and wellbeing across the City Corporation and provide corporate visibility to ensure good standards of health and safety performance in all the City's activities
- Ensure that the organisation of arrangements for carrying out the City's health and safety policy and other statutory requirements are adequate.
- Develop and oversee the implementation of health and safety strategy for the City Corporation.
- Monitor and track any enforcement action by relevant agencies being taken against the City Corporation and ensure corporate lessons are learnt
- Review specific health, safety and wellbeing policies for the City Corporation and consider best practice.
- Resolve issues that arise within or between Departments that have been unable to be resolved at a local level.
- Monitor the implementation of any strategy or improvement plans for health, safety and wellbeing within the City Corporation.
- Monitor key performance information regarding health and safety across the City Corporation and make recommendations for improvement where required.
- Monitor and make recommendations on the effective use of financial, human, physical and information resources with regard to effective management of health and safety.
- Determine and periodically review City Corporation-wide targets in respect of health and safety issues.
- Work with our Insurance team to actively identify trends and lessons learned to help mitigate/reduce the level of incidents

The Corporate Health and Safety Committee Constitution and Terms of Reference can be found on the intranet.

3.7 Occupational Health Service

The Occupational Health Service forms part of the competent adviser network as required under regulation 7 of the Management of Health and Safety at Work Regulations (MHSWR) 1999.

Their role in conjunction with the Health, Safety and Wellbeing Team is to provide advice on the health aspects of risk management. This also includes the provision of health surveillance programmes identified by management risk assessments under regulation 6 (MHSWR 1999).

The service provides information and advice to assist managers in meeting requirements laid down by health and safety legislation specific to health risk management. It also provides confidential and impartial advice to employees and management / HR on matters of health that may affect their ability to carry out some or all of their tasks.

The Occupational Health Service is responsible for promoting health and wellbeing matters in the workplace. The service plays an integral role to our progressive and proactive role as an employer to safeguard the physical health and mental wellbeing of our employees.

4. MONITORING & AUDITING

For this policy to be effectively implemented there need to be active and reactive monitoring processes in place. Assurance will be established by:

Documentation - Departmental Health and Safety Policies, Health and Safety Plans, copies of risk assessments, safe working methods, and training records will be written down and kept either electronically or in hard copy. It is essential that the working documents such as risk assessments are easily available and accessible to all employees.

Reporting - Key Performance Indicators are in place to monitor safety performance corporately. Indicators are proactive (lead) and reactive (lag). They will be used to monitor general compliance with health and safety at team, division, departmental and corporate level and drive improvement activity.

Managers will ensure that active monitoring is carried out in their areas, based on their Health and Safety Plans.

Compliance with these should be discussed as part of individual performance monitoring and be departmentally reviewed by their respective Senior Management Teams at least quarterly.

Independent Review

The competent persons for Property and People will ensure that a corporate audit & inspection plan is in place that includes all departments.

Systems and practices will be independently reviewed against corporate / local policies and procedures.

Health and safety management will be scrutinised further by the City's Corporate Audit function who will report to the Audit & Risk Management Committee as necessary.

External auditors may verify our arrangements and compliance with our policies from time to time.

The Health and Safety Executive as the national enforcement agency and other external accreditation bodies may require auditing whole or parts of our systems.

Employee Health and Wellbeing will be subject to continual monitoring through analysis of the dashboard of metrics with data extrapolated from the annual employee survey. In addition, we will fulfil our commitments to employee wellbeing outlined in the strategy.

5. COMMUNICATING AND UPDATING THE POLICY

A copy of this policy will be available to all employees and made generally available for reference to our partners and others. Access will be available through the staff Intranet.

It will be reviewed and modified from time to time and may be supplemented in appropriate cases by further statements relating to the work of particular departments or groups of workers.

Appendix 1: Health and Safety Responsibilities – Schools

Employer

The Health and Safety at Work etc. Act 1974 places overall responsibility for health and safety with the employer. Who this is varies with the type of school.

- For community schools, community special schools, voluntary controlled schools, maintained nursery schools and pupil referral units the employer is the Local Education Authority (LEA).
- For foundation schools, foundation special schools and voluntary aided schools, the employer is usually the governing body.
- For independent schools, the employer is usually the governing body or proprietor.

This Corporate Health Safety and Wellbeing Policy directly applies to our three Independent Schools (Freemen's, City of London School (Boys), City of London Schools for Girls), along with the Guildhall School of Music and Drama (GSMD).

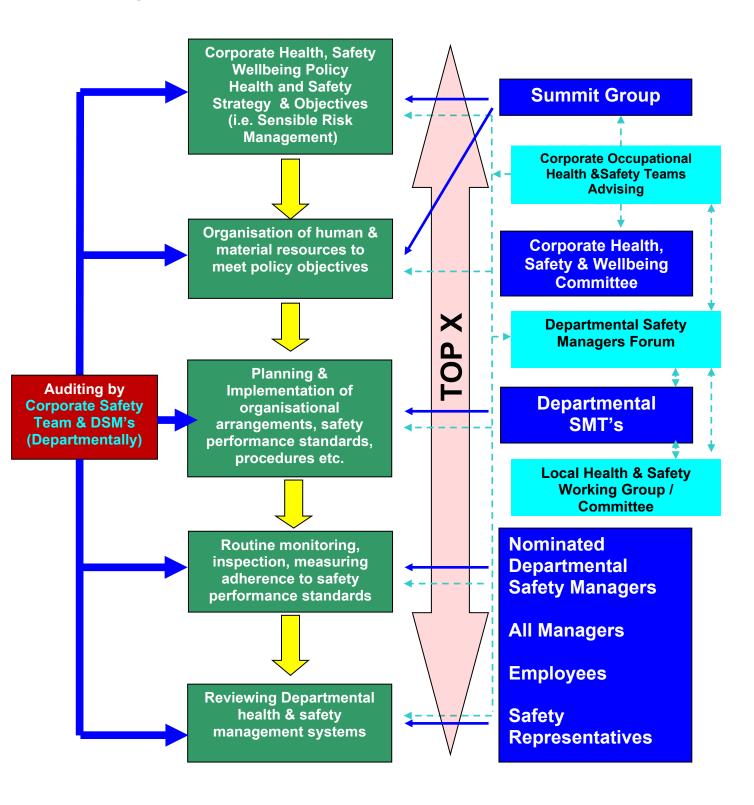
This policy does not apply to City of London Multi-Academies Trust and the other 'family' of sponsored / co-sponsored academy schools. Here the respective academy is the employer, and therefore, has the day-to-day operational responsibility for health and safety management.

The Education Board (representing the City Corporation's interest as a sponsor) and the Multi-Academies Trust has strategic health and safety responsibility for these academy schools. Its responsibilities are likely to include:

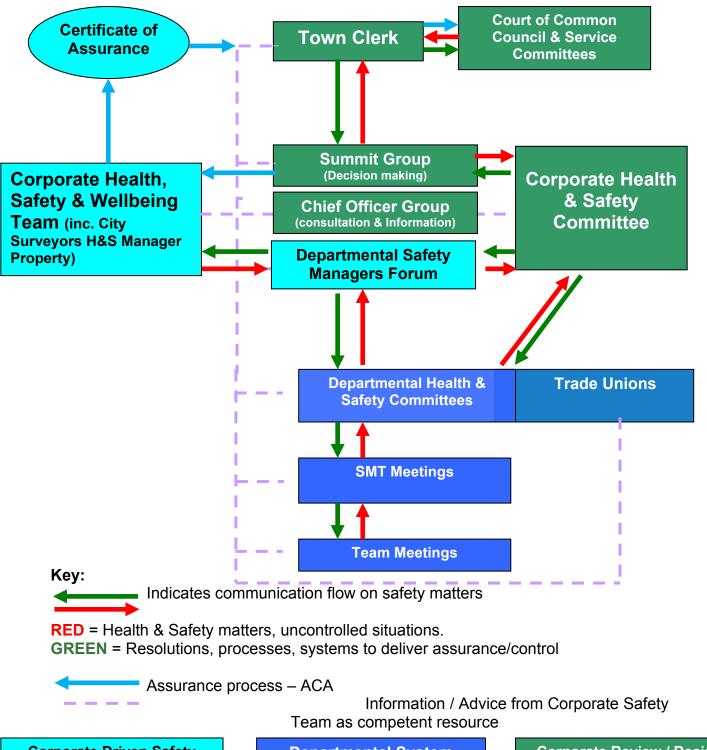
- Ensuring suitably documented policy and governance arrangements are in place in respect of strategic health and safety management / fire safety
- Ensuring the provision of competent health and safety advice (including curriculum and building safety standards)
- Setting suitable health and safety standards / key performance indicators, with robust high-level monitoring arrangements

The Governing Body of the Sir John Cass Foundation Primary is the employer and has ultimate responsibility for health and safety. The Department of Children's and Community Services (DCCS) have 'local authority' oversight.

Appendix 2 – City Corporation Health & Safety Management Arrangements



Appendix 3 – Consultation and Communication flowchart for Health and Safety Management at the City Corporation



Corporate Driven Safety Management Component

Departmental System

Corporate Review / Decision making mechanism

Document Control Sheet

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Development and Consultation:	This Policy was reviewed from previous versions. Its review was carried out to ensure that the CoL keeps Health & Safety as a business priority within the CoL in order to maintain the high standards of compliance in departments under the leadership of the Town Clerk.
Dissemination	It will be available to view and download from the COLNET
	intranet site and in the employee handbook.
	The Policy's existence will be disseminated to all staff across
Implementation	the organisation via staff newsletters, e-mail, etc The Health and Safety Team and Health & Safety Committee is
implementation	responsible for ensuring that this Policy is implemented.
Training	No formal training is required; however, it will be referenced.
	Health, Safety and Wellbeing will ensure that staff receive
	appropriate support in developing departmental policy and
	procedure documents. Templates will be provided on the
	Intranet. The Health, Safety & Wellbeing Manager will control
A -1'1	corporate Policy development.
Audit	The Health & Safety Sections are responsible for ensuring compliance.
Review	The Health, Safety and Wellbeing Manager will review this Policy biennially or as it becomes necessary.
Essential	This policy ensures CoL is in basic compliance of the Health
Standards of	and Safety at Work etc. Act 1974. It will also enable compliance
Quality and	throughout departments and support compliance with other
Safety	Health and Safety legislation. It is the driver for all Health and
	Safety Management systems.
Links with other	The Policy must be read in conjunction with the departmental
policies	Policies as required under this Policy. Local Safety
	arrangements & procedures must also be considered, these are also required to be developed by this document.
Equality & Diversity	An Equality Impact Assessment will be completed on this policy
•	prior to its consultation.

Revisions

Version	Page/ Para No	Description of change	Date Approved
01-02	Various	Updated to reflect wellbeing and changes to governance.	01.10.2016
01 – 03	Various	Minor revisions, corrections and updates completed. Explicit reference made to the Corporate Plan (2018 – 23) outcomes (p3 Introduction). Added Appendix 1: Schools H&S. E&I inclusion.	TBC