Council – 11 July 2011

Corporate Health and Safety Policy

Service Area: Human Resources & Development - Safety, Health & Wellbeing Services

Wards: All

1.   Summary of report

Following a process of consultation and consideration by the Corporate Health and Safety Board and Corporate Management Team, approval is sought for the revised Corporate Health and Safety Policy.

2.   Recommendations

That the Corporate Health and Safety Policy, appended to this report be approved.

3.   Background information

The Corporate Health and Safety policy is the foundation document in our written health and safety management system and draft version 9 has been approved by CMT and includes the following changes to version 8:

- Greater emphasis placed on the council's duty of care to non-employees
- Clarified the roles and responsibilities of councillors as policy makers
- Consideration of setting safety objectives as part of Employee Performance Assessments, (EPA)
- Realigned the order of contents to better resemble the Health and Safety Executive's model for Successful H&S Management (HSG65)
- Replaced outdated references to Senior Leadership Team and General Managers with Corporate Management Team (CMT) and Heads of Service
- Clarified the role of the Corporate Health & Safety Board
- Updated the list of Safety Management Standards
- Clarified the roles and responsibilities of health and safety professionals and local service advisors/coordinators

4.   Resource considerations

There will be no additional costs or staff resource implications in relation to the revision of the policy.

5.   **Citizen impact**

If correctly implemented, our service users will be safer because of this proposal to revise our Corporate Health and Safety Policy which is a fundamental document in our safety management system.

6.   **Community safety**

Use of our buildings, especially schools and other community buildings and spaces, out of hours and at weekends, exposes members of the wider community to safety and health risks. Continued focus on health and safety management will continue to protect the community enabling them to safely enjoy our facilities.

7.   **Environmental impact**

None

8.   **Performance and risk management issues**

It is imperative that the council maintains a robust health and safety policy and auditable systems to be implemented by services and teams. This ensures that we manage our health and safety risks effectively. Failure to do so could expose the council to regulatory intervention, costly prosecution and civil actions.

The Health and Safety at Work etc. Act 1974 requires all organisations to prepare a policy on health and safety if they employ more than five employees. In law, these documents are required to fulfil three objectives:

- To set out the organisations general statement of health and safety intent
- Explain the organisation for the management of health and safety.
- Describe the arrangements for the implementation of the policy commitments.

The Council's Safety Management System, (which includes the Corporate Health and Safety Policy), is designed to ensure that there are provisions in place at every level of the organisation to comply with the general duties set out in the Health and Safety at Work etc Act 1974 and other subordinate health and safety Regulations. Our policy achieves this through a hierarchy of safety management system documents which, at the lowest level, require teams to produce their own written local arrangements for the management of health and safety. The process of review and revision of the system will incorporate all relevant legislative changes which may occur from time to time.

Managers have been required to satisfy the legal requirement placed on employers to bring the health and safety policy, (and any changes to it), to the attention of all employees in their services and teams.

9.   Equality implications

None

10.   Consultation

As well as it being best practice, there is legislation that requires formal consultation with trades union appointed safety representatives on matters of health and safety at work. A sub-group to the Corporate Health and Safety Board was established in January 2010 whose purpose was to comment on all revisions of health and safety policies and procedures for recommendation to the Board. The group's membership includes heads of service. The group has recommended a revised Corporate Health and Safety Policy to CMT.

Background papers
None

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1 July 2011

Corporate Health and Safety Policy

Issue 9

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Walsall Council

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Walsall Metropolitan Borough Council

Corporate Health and Safety Policy

Foreword by the Chief Executive

This policy underlines our recognition that health and safety is equally important to our other aims, and we recognise our legal responsibilities.

This policy shows our duty of care to our employees and non-employees including our citizens to provide services in a way that will not put them at risk. In addition to providing a safe workplace, where possible we like to give advice to our employees about safety away from work.

The basis of our health and safety policy is to develop a climate in which a positive health and safety culture can develop. We will achieve this by:

- maintaining effective systems of **communication** on health and safety matters;
- making sure we are able to provide the necessary health and safety **competence**, support, advice, training, recruitment, placement procedures and health surveillance;
- maintaining **control** by setting clear health and safety standards and providing strong leadership; and
- securing **co-operation** between individuals, safety representatives, employee representatives and working groups.

We must all play our part in achieving the highest possible standards of health and safety and rigorously comply with all aspects of this policy as it highlights our vision for health and safety and everyone's role in achieving this.

You must read this document with the relevant topic-based Safety Management Standard (SMS), and your service area's health and safety local arrangements and procedures.

Paul Sheehan
Chief Executive

Section 1: General health and safety policy statement

We accept our legal responsibilities as an employer and will aim to protect the health, safety and welfare of our employees and others affected by our activities (for example, members of the public, including school pupils, visitors, contractors and so on). We will do this by assessing possible risks and introducing suitable and adequate measures to control those risks.

We are committed to keeping to all relevant health and safety at work laws. However, we realise that merely keeping to the law is a minimum requirement, and we will aim to achieve higher standards. We do this through a series of safety management standards (SMS)

All employees, not just managers, are responsible for keeping to our health and safety policy.

This leads to us continuously making our workplace a safer environment with the following extra benefits.

- Improving the quality of services.
- Reducing losses (including accidents) and liabilities.
- Encouraging all employees to think about how they can do their jobs more safely.
- Making continuous improvements in health and safety performance.

When losses (such as accidents) happen, this means that managers have failed to maintain control, and is not necessarily the responsibility of individual employees, who are our most important resource.

Health and safety is the concern of everyone within the council.

The success of any safety management system in reducing loss (including accidents) depends on the good sense and health and safety consciousness of everyone at work.

We expect all our employees to recognise their responsibility as set out in this policy, their service area's local statement of intent, local arrangements and procedures.

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a   Our responsibilities

We will take all reasonable steps to effectively maintain and improve how we manage health and safety risks by:

- Providing a safe and healthy working environment, providing safe routes to and from every place of work

- providing adequate support and facilities so that employee representatives (health and safety representatives appointed by trade unions) and other employee representatives can carry out their functions in line with the relevant law;

- providing safe plant, equipment and machinery;

- providing arrangements so items and substances at work can be used, handled, stored and transported safely;

- providing safe systems of working;

- providing adequate welfare facilities;

- providing information, instruction and training at all levels (including non-employees and contractors) making sure that the necessary levels of competence are in place to avoid ill health or injury at work, and increase awareness of employees' legal and moral obligations towards health and safety;

- providing suitable and adequate assessment of the health and safety risks to employees (while at work) and non-employees (arising out of our work activities);

- making and delivering arrangements so we can plan, organise, control, monitor and review preventive and protective measures effectively;

- helping employees to contribute positively to their own safety at work;

- providing adequate supervision of activities to make sure health and safety standards are met; and

- publishing each year the results of our health and safety performance.

b   Health and safety management

In line with our system of directorate management teams, health, safety and welfare management is the responsibility of each directorate. This will allow issues to be tackled at local level, wherever possible. However, although we do this for practical purposes, councillors and the chief executive still have overall responsibility for health and safety. We also name an executive director to highlight awareness of health and safety.

A corporate health and safety action plan is produced each year and each directorate must produce their own health and safety action plan as an integral part of the overall planning process.

Councillors, the chief executive and chief officers will monitor the system to make sure that it continues to be effective and appropriate.

The main role of the executive directors is to:

- make sure that health and safety is one of the most important considerations in developing policy and planning resources;
- monitor and review the effectiveness of health and safety strategies across the council; and
- make sure that health and safety is properly considered when buying in services and employing contractors.

Heads of service, head teachers, service and operational managers, line managers and supervisors play an important role in managing and supervising health and safety and in maintaining and improving health and safety standards. Members of staff may be allocated safety objectives as part of their Employee Performance Assessment targets

Without taking anything away from the main responsibility of managers and supervisors to make sure there are safe conditions at work, we will provide (through the corporate Safety, Health and Wellbeing (SHAW) service team) competent technical advice on health and safety matters to help line managers in their task. Section 2 of this document shows how health and safety responsibilities are organised.

We will make sure that we provide occupational health facilities and identify and control work-related ill health. We will also make sure that we monitor the work environment to encourage co-operation, partnership and joint consultation with health and safety representatives who have been appointed by trade unions and other employee representatives.

Effective communication of the health and safety policy is vitally important if it is to become more than words on paper. We will provide a summary of this document to all employees before they start work with us and make the policy available to existing employees through the corporate health and safety pages on our intranet site.

Health and safety will be a regular item on all team meetings - to make sure we all receive, and can discuss, information on any changes to the safety management system.

Our policy makers will review this document every two years and tell all employees about any changes.

Section 2: Organisation for health and safety

2.1: Control

Corporate management control arrangements are set out in the Organisation for Health and Safety section of this document. Directorate and service management control arrangements are included in written local arrangements.

Documents control: We maintain a library of SMS and relevant legislation and other national standards. All relevant staff can access this information by using our intranet site. This format means we can also control documents (documents become uncontrolled when they are printed).

a Individual responsibilities

All employees have a legal responsibility to meet the statutory requirements of the Health and Safety at Work etc Act 1974. At all levels of the organisation, our people will be:

- responsible for the safety and wellbeing of themselves, those people they manage and the people they work for;
- aware of their responsibility for health and safety issues and their effects on people within the activities they control; and
- aware of the influence that their action or inaction can have on the effectiveness of our safety management standards (see section 3 for a definition of SMS).

The executive director nominated for health and safety is responsible for making sure that appropriate programmes meet relevant national legislation and the corporate standards. The following people are responsible for health and safety.

- **Policy-makers**
  (The Leader, Council/Cabinet Members, Chief Executive, Executive Directors, Assistant Directors)
  They develop and are responsible for policy at a strategic level. They preserve, develop, promote and maintain our health and safety management system. Policy-makers also make sure that we take account of health and safety matters when we make organisational decisions.
  (Some policy-makers may also have planner and implementer duties).

- **Planners**
  (Heads of Service, Head Teachers, Service Managers, Operational Managers and Deputy and Assistant Head Teachers).
  They develop detailed local arrangements and procedures to achieve our corporate aims. They also contribute to our health and safety management system, by dealing with management arrangements for identifying, eliminating and controlling hazards and risks within their area of concern.
  (All planners also have implementer duties).

- **Implementers**
  (Line Managers, Supervisors and Heads of Faculty)
  They make sure that the workplace precautions and systems for controlling risk are in place and are put into practice.

- **Assisters**
  (Corporate Safety and Health Advisers, Occupational Health Advisers, Service Specific Safety Advisers and Local H&S Co-ordinators) They have the status and competence to advise management and employees (or their representatives). They will normally be the corporate safety or health officers of the SHAW service team. Those who have achieved a certain level of health and safety competency, such as trade union safety representatives and those staff who have been nominated as safety co-ordinators for their service area, may also be considered as assisters.

b   Health and safety policy-makers

Health and safety policy-makers will preserve, develop and maintain our health and safety management system by:

- identifying a structure for planning, measuring performance, reviewing performance, auditing and monitoring the health and safety management systems;

- developing both corporate and directorate health and safety plans and strategies to put policy into practice and including these in general business activity;

- making sure that responsibilities for safety, health and welfare are properly passed on, understood and carried out;

- agreeing plans for improvement and reviewing the progress of the health and safety management system and the corporate health and safety policy and action plan;

- making sure we fully consider the resources we need across service areas for putting our health and safety management system into practice;

- making sure that there is consultation between safety representatives and management teams;

- making sure that our health and safety performance is audited and that we take appropriate action to put things right;

- monitoring how service areas' health and safety action plans are put into practice, to deliver the corporate plan;

- making sure that service areas produce in-depth local arrangements that are in line with the corporate context, but which are specific to service areas, and that they are regularly monitored and reviewed and brought to the attention of all affected employees;

- where a work activity presents a serious and imminent risk of injury, making sure that the work activity stops until the risk is removed or reduced to an acceptable level (whether or not that activity is carried out by our employees, contractors or others);

- making sure that standards are clearly defined within a topic-based SMS to make sure we act within the law and promote best health and safety practice.

- carrying out safety tours to show their commitment to health and safety within their service area;

c   Health and safety planners

Health and safety planners will contribute to our health and safety management system by dealing with local management arrangements for identifying, getting rid of or controlling hazards and risks within their area of responsibility. (Hazards are those things with the potential to cause harm. Risk is the likelihood of someone being harmed). They will do this by:

- participate in the workplace inspection programme to demonstrate their commitment to health and safety across their service area

- making sure that health and safety responsibilities are properly passed on, understood and carried out by employees within their service area;

- telling the policy-makers what resources (including financial) are needed to meet their service area's obligations for health and safety matters, including providing equipment, clothing and training;

- setting up local management arrangements, risk-assessment programmes, risk-control systems, workplace precautions and associated performance standards, to make sure that they are monitored, reviewed and updated regularly and brought to the attention of employees;

- supporting the policy-makers in promoting our health and safety management system;

- asking for advice from the SHAW service team, or your service safety adviser, to make sure we effectively plan and put into practice the SMS, and making sure they are aware of relevant health and safety matters;

- monitoring how effectively their service area's local arrangements are put into practice, making sure that it reflects the aims of this policy and their health and safety action plan;

- when making decisions on behalf of their service area, making sure that any relevant health, safety and welfare issues are dealt with fully;

- making sure that their service area has a suitably-trained nominated persons, designated to assist their service area with the implementation of local arrangements;

- establishing and maintaining health and safety committees/health and safety working groups, (as appropriate), to promote the involvement of trade unions, employee representatives and managers in all aspects of health and safety.

d   Line managers and supervisors

All line managers and supervisors are responsible for managing health and safety in their area of responsibility. Support is available from the corporate SHAW service team and local health and safety co-ordinator, (where appointed) although line managers and supervisors will be ultimately responsible. We will give individual managers authority to put identified action plans into practice within the general limits of their authority. In particular, they will:

- make sure that all employees under their control are familiar with the relevant SMS and know how these are interpreted into local arrangements;

- set up and maintain within their service area safe, healthy working conditions;

- make sure there are safe systems of working and that significant findings arising from risk assessments and the necessary control measures to follow are brought to the attention of employees;

- inform all employees under their control of the fire evacuation procedure for their premises and the position of fire exits, alarms and equipment, and make sure that escape routes and exits are not blocked;

- show the commitment and motivation to achieve safe working attitudes and actions;

- reduce risk as far as possible through risk assessment, taking precautions to get rid of hazards, reduce risks or protect other people where necessary;

- audit and monitor (through observation, direct supportive supervision and 'managing by walking about') safe working practices and procedures (they should do this every day);

- make sure that safety procedures and training programmes are set up and maintained for all employees;

- make sure that job training is carried out by competent people;

- make sure that safety procedures are considered when designing, buying and using all new plant and equipment;

- make sure that new, reviewed or changed processes and services will be assessed for risks (preferably before they are put into practice);

- make sure that we investigate and follow up all accidents and incidents under the service area's control so that we can get rid of or control basic causes (this should help prevent them happening again);

- set yearly aims within their area to improve health and safety, record them as part of the service health and safety planning process and review performance against these aims;

- make sure that contractors' and other people's activities (for example, employees from other service areas) in the area or department are monitored to make sure they meet the relevant SMS;

- carry out safety inspections (including housekeeping) to identify hazards; and

- make sure that all employees, including safety representatives, are able to carry out their responsibilities, and encourage them to work with managers to promote an attitude of safe working across the council.

e   Employees

Employees have an important role to play in effective health and safety management. Employees are crucial to maintaining and improving health and safety standards, so all employees will:

- take reasonable care for their health and safety and that of other people who may be affected by what they do (or neglect to do) while at work;

- co-operate with us to meet any health and safety legal duty or need;

- not intentionally or recklessly interfere with, or misuse, anything provided in the interests of health, safety and welfare (for example, protective clothing, first-aid equipment and machinery guards);

- have a particular duty to other people to protect their safety, and make sure that they don't use any method of work that could be dangerous to themselves or members of the public;

- tell their line manager, without delay, about any work situation that might present a serious and imminent danger to themselves or others, or about any other problems in health and safety arrangements;

- always follow relevant procedures to avoid health and safety risks, and consult their line manager on any areas of concern;

- make sure they know and follow the guidance given to them by their line manager or supervisor in risk assessments, and protective measures needed when working (such as clothing or equipment);

- maintain tools and equipment in good condition and report any risk or problem to their line manager (employees must use equipment or materials for their proper purpose only);

- follow all instructions (whether spoken or in writing) given to protect their safety and the safety of others;

- be appropriately dressed for the particular working conditions and activities;

- behave appropriately at all times in the workplace;

- report all accidents, near misses, incidents of violence, diseases and dangerous events (whether or not someone is injured), as well as unsafe conditions, methods of work, practices, tools, plant, premises or equipment, to their line manager, their safety representative, the service safety adviser or the corporate SHAW service team, where appropriate;

- help fully in the reporting and investigating any accident, near miss, dangerous event or incident of violence;

- make suggestions to improve health and safety;

- go on all training courses designed to further the needs of health and safety, as necessary;

- make sure they understand all relevant processes, materials and substances, and get advice from their line manager if they're not sure;

- make themselves aware of the fire evacuation procedure for their premises and the position of fire exits, alarms and equipment, and make sure that escape routes and exits are not blocked;

- when working outside the direct control of their immediate supervisor, identify (and report to) the person controlling the site so they understand site safety rules or special requirements (for example, protective clothing); and

- not take any action or get involved in any activity, while at work, that would harm the health and safety of any other employee, visitor or person living in the borough.

All employees have a duty to co-operate at all times to help us meet these aims. We insist on safe working methods. Employees who ignore safety rules and procedures may face an investigation leading to disciplinary action, up to and including dismissal.

f   The corporate Safety, Health and Wellbeing (SHAW) service team

They have the necessary status and competence to advise management and employees, and will:

- write, publish and review the health and safety management standards, (draft a corporate health and safety action plan), for approval by the policy-makers, set realistic standards and targets, advise on priorities and set up adequate corporate systems and performance standards;

- review our performance and audit our health and safety management system;

- help with, monitor and develop our health and safety policy by consulting managers and safety representatives;

- use executive powers (on behalf of policy-makers), which may include stopping any work activities, where there is a serious and imminent risk of injury.

- report as necessary to the cabinet of the council or the Corporate Management Team (CMT) (or both), on health and safety matters; and

- liaise and co-operate with the Health and Safety Executive (HSE) and other appropriate organisations.

- advise health and safety committees

- maintain continuing professional competence

g   Service safety advisers, local health and safety co-ordinators and safety representatives

Together with the corporate SHAW service team, their activities may include:

- assist managers develop local health and safety arrangements and procedures to meet the relevant topic safety standard;

- promote a positive health and safety culture;

- assist managers to assess risks and identify controls;

- act as a focal point for health and safety issues that are relevant within their own service area;

- advise on appropriate health and safety training for managers and supervisors or other employees, as necessary, to make sure we act within the law;

- work closely with the health and safety planners, and report to their line managers on matters concerning health and safety; and

- comment on policy development and review when appointed to be a member of the various safety committees

2.2: Cooperation

a Safety representatives

TU appointed safety representatives are encouraged to cooperate with managers regarding any health and safety issues within the workplace and support and promote the safety committee structure.
Managers should consult with TU appointed safety representatives prior to making any changes which may affect the health, safety or welfare of any employee; e.g. changes to systems of work or the place of work and situations which could include the use of contractors on site.

b Health & safety committees

The prime function of the safety committee structure is to keep under review the measures taken to ensure the health, safety and welfare of employees working within the council or any others who could be affected. The Corporate Health and Safety Board is our senior health and safety consultation forum and is instrumental in the ongoing development of the corporate safety management system by making recommendations to CMT/Cabinet/Council where amendments are considered to be necessary. The safety committee structure also allows for health and safety working groups to be established to support health and safety management and report progress to a relevant safety committee.

Committees will promote co-operation between the employer and employees in instigating, developing and carrying out appropriate measures to include:

- reporting to, and receiving reports from, other committees within the H&S committee structure;
- co-ordinating and progressing measures to ensure the health, safety and welfare of staff and other persons affected by the operations of the council;
- studying accidents, accident trends, violent incidents, notifiable disease statistics and trends, so that relevant reports can be submitted to the corporate health and safety committee or management, which might include recommendations for corrective action;
- considering any reports from Inspectors or Regulators as they impact the council;
- receiving reports from safety representatives;
- examination of safety audit reports;
- assisting the development of the safety management system;
- monitoring the effectiveness of employee safety training;
- carrying out health and safety inspections;
- monitoring the introduction of new technologies which may have health and safety consequences for employees and others;
- monitoring the implementation of risk control measures identified by risk assessments;
- monitoring progress of health and safety action plans.
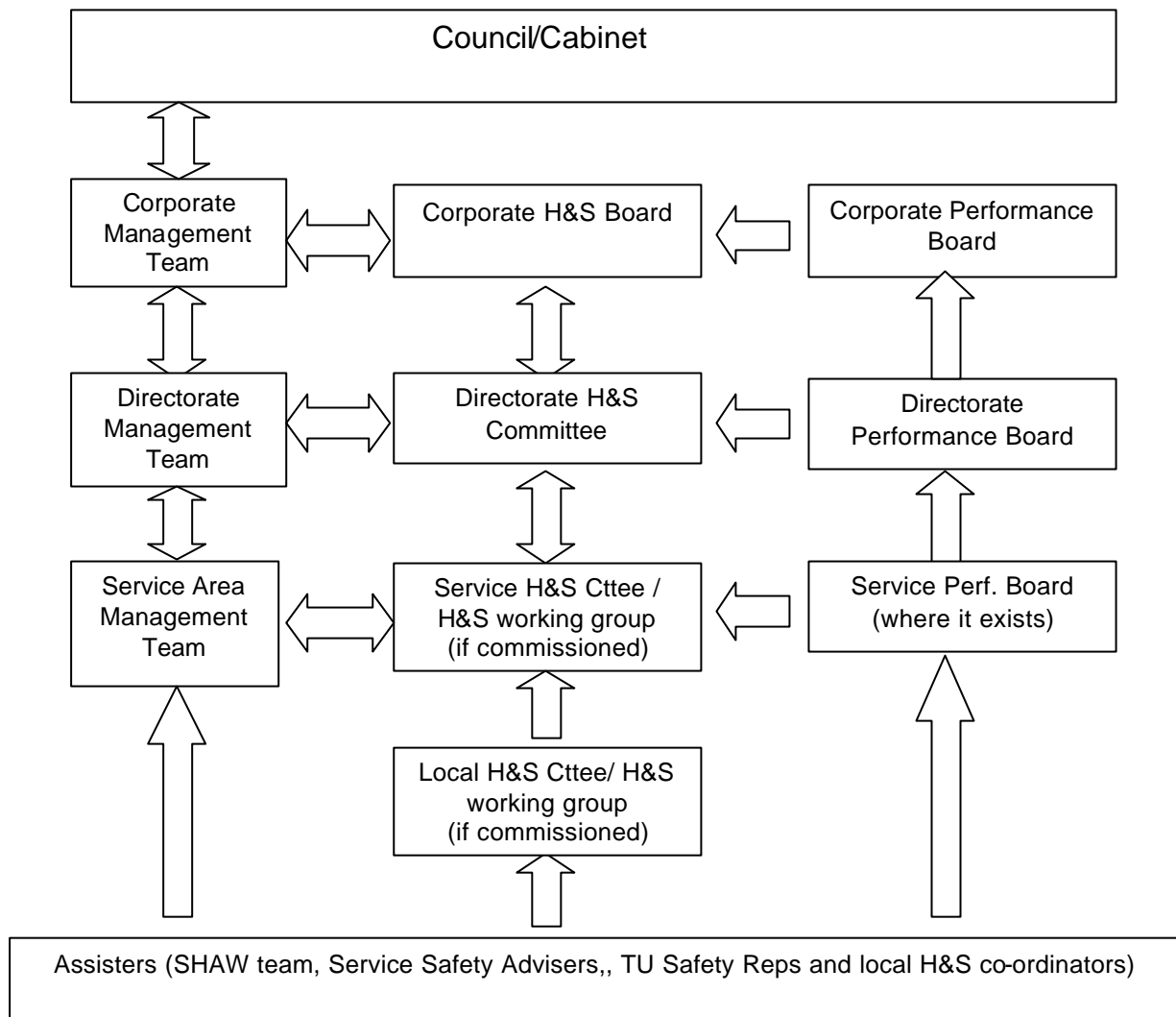
2.3: Competence

The necessary levels of competence for managers and other individuals are set out in the Safety Training page within the SHAW web pages. These are designed to support the topic based Safety Management Standards. Each directorate should develop their own training plans around the corporate health and safety training programme.

2.4: Communication

As part of our commitment to deliver effective communication to all our employees, we will give new employees a summary of this document when they begin working for us. If our health and safety policy changes, we will immediately tell all managers and employees through, health and safety committees, , employee newsletters, staff notice boards, employee briefing meetings, computer networking and so on.

We will maintain a corporate health and safety intranet http://inside.walsall.gov.uk/index/service_information/shaw.htm as a way of communicating corporate safety standards and as a document control system. We will make a copy of this corporate health and safety policy available on the council's website

www.walsall.gov.uk

Section 3: Health and safety arrangements

This section sets out the arrangements for the implementation of the policy across the council.

To help us manage the health and safety risks and issues within the organisation, we have developed a series of topic-based safety management standards.

a   Safety management standards (SMS)

The aim of the SMS is to define the minimum knowledge needed to meet legal and corporate standards. They are prepared and maintained by the SHAW team

The main areas are:
- definitions used;
- the standards;
- links to additional guidance, templates, forms;
- regular compliance self-audits;

These management standards are based on the principle of getting rid of the hazard as the first step in controlling the risk. We give more detailed guidance on topic standards and relevant law in each SMS. The topic standards cover the following main health and safety topics.

• Asbestos	• Home working	• Radiation
• Contractors	• Legionella	• Reporting incidents
• Display screen equipment	• Lifting operations	• Risk assessment
• Driver vehicle and road safety	• Lone workers	• Slips, trips and falls
• Electricity/gas	• Manual-handling operations	• Stress
• Fire	• Noise	• Work equipment
• First aid	• New mothers/pregnant women	• Working conditions
• Vibration	• Personal protective equipment	• Workplace inspections
• Hazardous substances	• Pressure Systems	• Young workers and work experience

Each SMS has been developed to set out the arrangements for managing health and safety council wide and as such the topics are generally relevant to all service areas. Inevitably there will be the need for directorates to develop their own service specific procedures. Directorate Health and Safety Action Plans are used to track this activity.

One of the main methods for making sure that each topic management standard is effective is the audit process. Audits allow us to review our performance and to make sure we continue to improve.

Although the SHAW service team has Chartered Safety and Health Practitioners, (CMIOSH) and Specialist Community Public Health Nurses, (SCPHN), line managers are responsible for all aspects of health and safety in their service area. Employees should first discuss health and safety issues with their line manager.

At times, we may need specialist outside advice (for example, for controlling legionella; the bacteria that causes legionnaire's disease, or for specialist safety training). These specialists may be checked and approved by the corporate SHAW service team before being added to our approved list of contractors and suppliers.

b   Local arrangements and procedures

Managers must develop local arrangements for delivering effective health and safety management. Local arrangements will detail the roles, responsibilities and authorities of local (named) individuals who will co-ordinate, manage and carry out some of the local procedures.

In all cases the local arrangements will 'translate' the SMS into local, specific and deliverable instructions to make sure we meet the corporate standard.

The health or safety officers of the SHAW service team are happy to coach management teams in developing local arrangements.

Section 4:   Measuring performance

As a way of measuring our performance and whether we meet our targets, we will measure the performance of the topic-based SMS as follows.

'Proactive measures' of performance that monitor whether we are meeting targets, for example:

- regular documented management audits;
- site inspections at set times;
- the results any SMS auditing activity;
- the number of people exposed to a risk;
- new work projects assessed as having no relevant risk;
- the frequency of surveys and reports from safety committees;
- the frequency of, and attendance at, safety meetings; and
- the results of investigations by safety representatives.

We expect line managers to monitor whether we are meeting targets through direct supportive supervision and 'managing by walking about'.

'Reactive measures' such as:
- staff having to visit occupational health (that can reasonably be considered to be caused by exposure to the risk being measured);
- civil claims against us; and
- the number of reports of near misses, incidences of illness or accidents.

We expect line managers to monitor whether we are meeting the SMS by reviewing accident investigations and sharing findings, reviewing near-miss reports and monitoring areas and teams after incidents.

Identifying the basic cause of incidents is essential for all safety management systems, as it highlights any problems and any improvement plans that we can put into practice.

Section 5: Auditing and periodic status review

a Auditing

We will regularly audit service areas' performance in individual topic-based SMS.

These audits will be carried out by competent people who are as independent as possible from the service area being audited (and may be carried out by members of the corporate SHAW service team). Or, different service areas could audit themselves.

We will report audit outcomes promptly to relevant managers, and require them to make adjustments to safety action plans.

b Periodic status review

We will continually review the status of each SMS. Formal SMS reviews will include:

- an overall reduction of risks;
- the overall performance of the SMS;
- the performance of individual parts of the SMS;
- the findings of the audit;
- basic changes in organisational structure, new processes or new technology;
- external regulatory or guidance factors (for example, legislation or British Standards); and
- the results of an independent external audit, if there is one.

The design of this management system allows us to deal with and adapt to internal and external factors. The periodic status review gives us an opportunity to look forward.

We use the information we gain to improve our approach to reduce risk as far as possible and improve business performance. We will use this review process to further develop suitable plans to reduce risks plans at each location within their safety action plans.

If you would like this information in another format or language, please ask for this using the contact details below.

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