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**INTRODUCTION**

Organisations have a legal duty to put in place suitable arrangements to manage for health & safety. This guidance provides a framework for doing that effectively, in way that individual organisations can tailor to their circumstances. In implementing your arrangements you should consult with your employees or their representatives, including Trade Unions where they are recognised.

**Who is this guidance for?**

It is for leaders, owners and line-managers. It will be of particular value to those who need to put in place or oversee their organisation's arrangements for health and safety. It will also be of interest to workers and their representatives, health & safety practitioners and training providers.

**How the guidance can help you**

The framework described in this document is universal but how far action is needed will depend on the size and nature of the organisation, and the risks from its activities, products or services. If you just need some basic information or are getting started in managing for health and safety in your organisation then the starting point for you will be: (link to) [Health and safety made simple: the basics for your business](#)

To help you in put in place the necessary measures to manage the real risks to health and safety in your organisation this guidance gives you:

- The Core Elements of Managing for Health and Safety and how they can fit with how you run the rest of your business (Part 1);
- Evidence to look for when deciding if you are doing enough to manage health and safety effectively (Part 2);
- More detail on how to deliver important areas of managing for health and safety. This is of particular relevance to those have to put in place or improve arrangements (Part 3).

The guidance also signposts other information, available from HSE and other organisations, that may be helpful to you.

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**PART 1 - CORE ELEMENTS OF MANAGING FOR HEALTH & SAFETY**

Organisations have a legal duty to put in place suitable arrangements to manage for health & safety. As this can be viewed as a wide ranging, general requirement HSE encourages a common sense and practical approach; it should be part of the everyday process of running a business and an integral part of workplace behaviours and attitudes. It doesn't matter what the size, industry or nature of your organization, the keys to effectively managing for health and safety are:

- Leadership & management (including sound business processes) and
- A trained/skilled workforce operating in
- An environment where people are trusted and involved.

HSE advocates that all of these elements, underpinned by an understanding of the profile of risks the organisation creates or faces, are needed:



Successful delivery can rarely be achieved by one-off interventions. A sustained and systematic approach is necessary; this doesn't require a formal health & safety management system but, whatever approach is used, it probably contains the steps; **Plan, Do, Check, Act**<sup>1</sup> (to act is to learn and improve from experience). The success, however, of whatever process or system is in place hinges on the attitudes and behaviours of people in the organisation.

The high-level descriptions may vary, depending on the industry or sector you are working in, but the actions involved in delivering effective arrangements are described in Table 1:

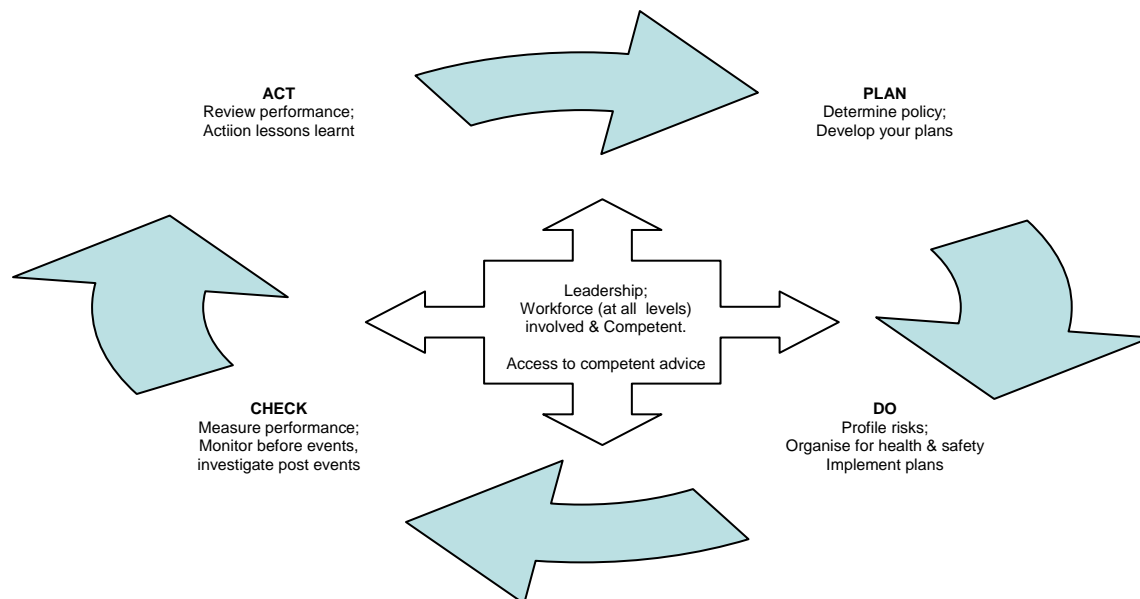
**Table 1** – Summary of 'Plan, Do, Check, Act' in conventional and process health & safety

	Health & Safety Management	Process Safety
<b>PLAN</b>	Determine your Policy; Plan for implementation.	<i>Define &amp; communicate acceptable performance and resources needed.</i>
		<i>Identify and assess risks; Identify controls; Record &amp; maintain process safety knowledge.</i>
<b>DO</b>	Organise for health & safety; Profile risks; Implement your plans.	<i>Implement and manage control measures.</i>
		<i>Measure &amp; review performance; Learn from measurements and findings of investigations.</i>
<b>CHECK</b>	Measure performance (monitor before events; investigate post events).	
<b>ACT</b>	Review performance; Act on lessons learned.	

<sup>1</sup> Previous HSE guidance has focussed on a single model: Policy, Organising, Planning, Measuring, Auditing and Reviewing (POP MAR) as an approach to managing health and safety. This remains an option but HSE's current approach is to read across more directly between effective management generally and effective health & safety management, and in doing that recognise alternative approaches to achieving same outcome.

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More information on the Actions involved in delivering effective arrangements for managing for health & safety, and the links back to **Plan, Do, Check, Act** can be found in Table 2. **Plan, Do, Check, Act** should not be seen as a once-and-for-all action:



You may need to go round the cycle more than once, particularly when:

- starting out;
- developing a new process, product or service, or;
- when implementing any change.

It is your decision whether to use a formal management system or framework.

Examples include:

- National and international standards such as *BS EN ISO 9001:2008 Quality management system* or *ISO/BSI 18001 BS OHSAS 18001:2007 Occupational health and safety management systems* etc;
- In-house standards, procedures or codes;
- Sector-specific frameworks such as the Energy Institute's *High level framework for process safety management* or the *xxxxxxx xxx xxxxx*

Although the language and methodology vary the key actions can usually be traced back to: 'Plan, Do, Check, Act'.

Effectively managing for health and safety, however, is not just about having a management or safety management system: the success of whatever process or system is in place still hinges on the attitudes and behaviours of people in the organisation. The examples (see pages xx), against the key areas of "what it looks like when done effectively", are indicative of positive health & safety attitudes and behaviours. Conversely, if there are facets of "what it looks like when it is done badly or not at all" this could indicate underlying cultural issues.

*DRAFT***Legal Duties**

All organisations have processes or arrangements to deal with payroll, personnel issues, finance and quality control. The Management of Health and Safety at Work Regulations (MHSWR) 1999 requires employers to put in place arrangements to control health and safety risks. Organisations should have as a minimum the processes and procedures required to meet their legal requirements, including:

- a written health and safety policy (if you employ five or more people);
- assessments of the risks to employees, customers, partners and any other people who could be affected by their activities; and record those findings in writing (if they employ five or more persons);
- arrangements for the effective planning, organisation, control, monitoring and review of preventative and protective measures that come from the assessment of risks;
- access to competent health and safety advice;
- providing employees with information about the risks in your workplace and how they are protected;
- instruction and training for employees in how to deal with the risks;
- ensuring there is adequate and appropriate supervision in place;
- consultation with employees about their risks at work and current preventive and protective measures.

HSE provides advice and templates on these processes – see **Key Guidance and Resources** for more information.

Documentation on health and safety should be functional, concise, with the emphasis on its effectiveness rather than sheer volume of paperwork. Excessive focus on the formal documentation of a health and safety management system distracts from addressing the human elements of its implementation; the focus becomes the process of the system itself rather than actually controlling risks.

*DRAFT***Table 2 - Actions involved in delivering effective arrangements for managing for health & safety: Where to start**

<b>Plan</b>	<p>Think about where you are now and where you need to be</p> <p>Say what you want to achieve, who will be responsible for what, how you will achieve your aims, and how you will measure your success; you may need to write down this <b>Policy</b> and Plan.</p> <p>Decide how you will measure performance. Think about ways to do this that go beyond looking at accident figures</p> <p>Consider fire and other emergencies. Co-operate and co-ordinate plans with anyone who shares the workplace</p> <p>Remember to plan for changes and identify any specific legal requirements that apply to you</p>
<b>Do</b>	<p><b>Organise</b> your activities to deliver your plans. In particular seek to:</p> <p>Involve workers, Communicate, so that everyone is clear on what is needed and can discuss issues – develop a positive health &amp; safety culture.</p> <p>Provide adequate resources, including where needed competent advice</p> <p><b>Implement your Plans</b></p> <p>Identify your risk profile: Assess the Risks, identify what could cause harm in the workplace, who it could harm and how, and what you will do to manage the risk. Decide what the priorities are and identify the biggest risks.</p> <p>Decide on the preventative and protective measures and put them into place</p> <p>Provide the right tools and equipment to do the job</p> <p>Train and instruct, to ensure everyone is competent to carry out their work</p> <p>Supervise to make sure that arrangements are followed</p>
<b>Check</b>	<p><b>Measure your performance</b> to see how well the risks are being controlled and if you are achieving your aims. In some circumstances formal audits may be useful.</p> <p>Investigate the causes of accidents, incidents or near misses</p>
<b>Act</b>	<p><b>Review performance;</b> learn from accidents and incidents, ill health data, errors and relevant experience</p> <p>Action lessons learnt, including from audit and inspection reports</p> <p>Revisit plans, policy documents and risk assessments to see if they need updating</p>

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**PART 2 – ARE YOU DOING ENOUGH? – QUESTIONS FOR LEADERS, OWNERS AND LINE MANAGERS OF ORGANISATIONS**

This section is focused on leaders, owners and line-managers. In addition to guidance on legal duties it gives you examples of evidence to look for when deciding if you are doing enough to manage for health and safety effectively. It will help you answer questions such as:

- What are the strengths and weaknesses of your organisation's health and safety performance, and are there any barriers to change?
- How reliable and sustainable for the future are the measures currently in place?
- If your organisation is getting risk control right, why is that? For example, does performance depend on one person's dedication and enthusiasm or is it a key value across the organisation?
- If there are problems, what are the underlying reasons, e.g. competence, resources, accountability?
- Have you learned from situations where things have gone wrong?

It also reflects the areas that the health & safety regulator would consider when assessing the effectiveness of your arrangements.

**Leading and Managing for Health & Safety**

The risk profile of an organisation informs all aspects of the approach to leading and managing the health & safety risks of the business. Leaders, at all levels, need to understand the range of health and safety risks in their part of the organisation and to give proportionate attention to each - in terms of the level of detail and effort put into assessing the risks and the effort put into implementing controls, supervising and monitoring.

*'There is a need for a sensible and proportionate approach to risk management, in short, a balanced approach – this means ensuring that paperwork is proportionate, does not get in the way of doing the job, and it certainly does not mean risk elimination at all costs.'*

Judith Hackitt, HSE Chair, September 2008.

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<b>LEADING &amp; MANAGING FOR HEALTH &amp; SAFETY</b>
<b>AM I DOING ENOUGH? – Questions to ask yourself</b>
<p><b>Leading for health &amp; safety</b></p> <ul style="list-style-type: none"> <li>• Is there leadership from the top of your organisation? Is it visible?;</li> <li>• What example do you set?; Do you talk about health &amp; safety; When did you last do this?</li> <li>• What are <b>your</b> significant risks and how do I know they are being controlled?</li> <li>• Are the health and safety implications of your business decisions recognised and addressed?</li> </ul>
<p><b>Management Tasks</b></p> <ul style="list-style-type: none"> <li>• How is health &amp; safety included in the processes or management arrangements you have for running the business?</li> <li>• Are the health &amp; safety responsibilities of key people set out e.g. who is the champion/focus at board, who sets policy and standards, who monitors, are these responsibilities reflected in their job descriptions?</li> <li>• How do you ensure access to competent advice?</li> <li>• How do you ensure health &amp; safety information is communicated effectively within and beyond your organisation?</li> <li>• How do you control your contractors?</li> <li>• How do you review your health &amp; safety performance?</li> </ul>

<b>LEADING &amp; MANAGING FOR HEALTH &amp; SAFETY</b>	
<b>What it looks like when done effectively</b>	<b>What it looks like when it is done badly or not at all.</b>
<p><b>Leaders:</b></p> <ul style="list-style-type: none"> <li>- Maintain attention on the significant risks and implementation of adequate controls.</li> <li>- Demonstrate their commitment by their actions, they are aware of the key health &amp; safety issues;</li> <li>- Ensure consultation with the workforce on health &amp; safety.</li> </ul>	<p><b>Leaders:</b></p> <ul style="list-style-type: none"> <li>- Set no H&amp;S priorities set and lack understanding of need to maintain oversight.</li> <li>- do not meet their own standards/procedures e.g. wearing correct PPE on site/shop floor.</li> <li>- Lack of engagement with H&amp;S by workers.</li> <li>- Health &amp; safety is seen as an add-on or irrelevance</li> <li>• Poor incident history (accidents, near misses, plant damage or other indicators e.g. poor maintenance, poor housekeeping).</li> </ul>
<p><b>Management of health &amp; safety</b></p> <ul style="list-style-type: none"> <li>• A systematic approach is used to manage health &amp; safety</li> <li>• People understand the risks and control measures associated with their work. Contractors adhere to the same standards</li> <li>• Appropriate documentation is available: current, organised, relevant</li> <li>• People understand their roles and others.</li> <li>• Performance is measured – to check controls are working and standards being implemented, and after things go wrong to learn from mistakes.</li> </ul> <p><b>Beyond compliance:</b></p> <ul style="list-style-type: none"> <li>• A formal system (such as ISO 9001 or something similar) is used: has it been externally accredited?</li> <li>• Health &amp; safety is integrated into business processes</li> <li>• Benchmarking is used to compare performance with others.</li> <li>• Supply chains are influenced to improve health &amp; safety.</li> </ul>	<p><b>Management of health &amp; safety</b></p> <ul style="list-style-type: none"> <li>• Incomplete or missing paperwork. Does not link to actual risks in workplace.</li> <li>• Confusion over roles, inaction as no one takes responsibility for health &amp; safety, distrust of management motives.</li> <li>• Widespread, routine violations of procedures. No oversight of contractors.</li> <li>• Information not passed on, not understood, not implemented.</li> <li>• Managers unaware of employee concerns or do not respond appropriately</li> <li>• lessons are never learnt.</li> </ul>

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**Additional factors to consider if you are working in...**

*A Board or as a Director:* This link will help you set your agenda for effective leadership of health & safety:

[www.iod.com/hsguide](http://www.iod.com/hsguide)

*Smaller businesses:* A formal, documented system is not always necessary. The behaviours and attributes of perhaps one person – the business owner - or a very small group are critical. What the owner does to set an example and to provide a lead on health and safety to their staff determines the outcome.

Medium sized enterprises can show a mix of the formal and informal when it comes to health & safety arrangements.

*Larger organisations:*

- Is there is someone who champions health & safety on the board?
- Who sets the organisational policy and standards and how are they monitored?
- Does the Board receive and act upon reports on health & safety matters?
- What Key Performance Indicators do you use to monitor health & safety performance?
- Do you periodically review your arrangements for managing for health and safety in light of any organisational changes?

*Process Industries:* Leadership on the key area of process safety is core. Board level involvement and competence are essential; constant and active engagement in and promotion of process safety by the leadership sets a positive safety culture- this is the concept of “rigour in leadership”. Key factors to address are:

- How do you maintain corporate knowledge, overall technical leadership and competence?
- How do you monitor process safety performance to ensure business risks are effectively managed?
- Do you publish safety information to provide public assurance?

*Managing for health:* Dealing with work-related ill-health issues in an organisation may not be as straightforward as a safety issue. Getting the right competent advice to identify what needs to be done is important.

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**Competence**

Competence is the ability to undertake responsibilities and perform activities to a recognised standard on a regular basis. It combines practical and thinking skills, knowledge and experience.

The Management of Health and Safety at Work Regulations (MHSWR) 1999 require an employer to appoint one or more competent persons to assist them in undertaking the measures they need to take to comply with the legal requirements. That could be a member of the workforce, the owner/manager, or an external consultant. The competent person(s) should focus on the significant risks and those with serious consequences.

The competence of individuals, whether they are employers, managers, supervisors, employees and contractors, or those with safety critical roles (such as plant maintenance engineers) is vital – it ensures they recognise the risks in their activities and can apply the right measures to control and manage those risks.

*‘Truly effective health and safety management requires competency across every facet of an organisation and through every level of the workforce.’* HSE Strategy document 2009

<b>COMPETENCE</b>	
<b>AM I DOING ENOUGH? – Questions to ask yourself</b>	
<ul style="list-style-type: none"> <li>▪ <b>Health and safety responsibilities of managers/supervisors</b> – how are they made aware of them? What training have they been given to fulfil roles and responsibilities? How are they held accountable? Do they recognise continuing development needs e.g. annual appraisals?</li> <li>▪ <b>Who fulfils the role of health and safety competent person?</b> What is their background, training and qualifications? What is their awareness of current health and safety law relating to key risks? Do they have enough time to dedicate to health&amp; safety.</li> <li>▪ External provider of competent advice – How were they selected? What is their competence to provide advice to this particular duty holder? Do they allocate adequate resources and tailor advice to this particular duty holder? Check the documentation provided e.g. visit reports, is suitable, covers the key hazards, assesses the rights risks and gives the right advice.</li> <li>▪ <b>Does the organisation act upon advice from the competent person?</b></li> <li>▪ If there is an identified lack of competence in a particular area, what are you doing to deal with the problem?</li> <li>▪ How are staff selected for the tasks carried out?</li> <li>▪ Are arrangements in place to:                             <ul style="list-style-type: none"> <li>- ensure staff aware of roles and responsibilities?</li> <li>- identify the training they need?</li> <li>- ensure relevant and sufficient training is delivered? Look for use of training schedules, operating manuals, sampling delivery of training, training for trainers etc.</li> <li>- check the necessary level of competence has been reached?</li> <li>- check that training is applied?</li> <li>- provide update / refresher training?</li> <li>- Ensure training records are kept?</li> </ul> </li> </ul>	

<b>COMPETENCE</b>	
<b>What it looks like when it is done effectively</b>	<b>What it looks like when it is done badly or not at all</b>
<ul style="list-style-type: none"> <li>• All know the risks created by the business and understand how to manage them;</li> <li>• Key responsible persons/job holders identified and clearly established roles and responsibilities;</li> <li>• People have the necessary training, skills, knowledge and experience to fulfil their responsibilities and are given sufficient time to do so;</li> <li>• Training takes place during normal working hours and employees are not charged</li> </ul> <p><b>Beyond compliance</b></p> <ul style="list-style-type: none"> <li>• Lessons learnt, and good practice are shared internally and externally;</li> </ul>	<ul style="list-style-type: none"> <li>• Lack of awareness of key hazards/risks.</li> <li>• People lack the skills, knowledge and experience to do their job.</li> <li>• H&amp;S advice and training is irrelevant/incompetent/wrong.</li> <li>• No standards set; people not held accountable.</li> <li>• Insufficient action is taken to comply with the law;</li> <li>• Knee jerk reactions follow incidents/near misses.</li> <li>• The company does not know what it needs to do to move forward.</li> </ul>

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**Additional factors to consider if you are working in...**

*Smaller businesses* In small businesses the responsibility of providing competent advice often rests with the owner/manager. This link will help you ask the right questions if you are looking for competent health & safety advice:

<http://www.hse.gov.uk/pubns/indg420.pdf>

*Larger organisations:* Who has the board lead on health & safety? What is their competence in and awareness of health and safety issues? Do they play an active part and how do they support the health and safety competent person?

*Process industries:* At least one board member should be technically competent in process safety management. The competence of plant maintenance engineers is also crucial. See Joint HSE/PSLG guidance on the Principles of Process Safety Leadership for further information:

<http://www.hse.gov.uk/comah/buncefield/pslgprinciples.htm>

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**Worker Involvement**

Worker involvement is the full participation of the workforce in the management of health and safety. It can be considered in stages. The stages of provision of information, instruction, training and engaging in consultation with employees, especially Trade Unions where they are recognised, are all legal requirements. The final stage, the full involvement of the workforce, is beyond the required minimum legal standard. However, at its most effective full involvement creates a culture where relationships between employers and employees are based on collaboration, trust and joint problem solving; employees are involved in assessing workplace risks and the development and review of workplace health and safety policies in partnership with the employer.

*‘I find it hard to imagine how one could ever put in place an effective workplace health and safety system that did not include real participation and engagement of the workforce.’*

Judith Hackitt, HSE Chair, November 2008

<b>WORKER INVOLVEMENT</b>
<p><b>AM I DOING ENOUGH? – Questions to ask yourself</b></p> <ul style="list-style-type: none"> <li>• How are employees or their representatives consulted and involved in health and safety matters?</li> <li>• How effective are those mechanisms in relation to organisation size, structure, or rate of workplace change?</li> <li>• Are the needs of any vulnerable employees/ workers (temporary or agency staff, or those whose first language is not English) met through e.g. the use of interpreters, use of symbols and diagrams rather than written instructions?</li> <li>• Are employees consulted in good time?</li> <li>• Do health &amp; safety representatives have access to the facilities they need to carry out their functions?</li> </ul>

<b>WORKER INVOLVEMENT</b>	
<b>What it looks like when done effectively</b>	<b>What it looks like when it is done badly or not at all</b>
<ul style="list-style-type: none"> <li>• Provision of instruction, information, training to enable employees to work in a safe and healthy manner;</li> <li>• Safety representatives/representatives of employee safety (RoESs) carry out their full range of functions.</li> <li>• Workforce consulted (either directly or through their representatives) in good time on issues relating to their health and safety and the results of risk assessments;</li> </ul> <p><b>Beyond compliance:</b></p> <ul style="list-style-type: none"> <li>• Feedback mechanisms exist for health and safety matters, e.g.:                         <ul style="list-style-type: none"> <li>- “suggestions boxes” or more formal open meetings with management;</li> <li>- Team meetings are held and may be led by employees.</li> </ul> </li> <li>• Joint decisions on health &amp; safety are made between managers and workers</li> </ul>	<ul style="list-style-type: none"> <li>• Employees lack the right level of information, instruction and training needed to do their job in a safe and healthy manner</li> <li>• Representatives cannot exercise their functions.</li> <li>• Employees don’t know who they would go to if they had health and safety concerns.</li> <li>• Health and safety controls don’t seem practical or employees are having to work around difficulties.</li> <li>• Line managers don’t discuss:                         <ul style="list-style-type: none"> <li>- How to safely use new equipment</li> <li>- How to do a job safely</li> </ul> </li> <li>• There is little or no evidence of information being cascaded through the organisation (e.g. team meetings, notice boards etc).</li> </ul>

**Additional factors to consider if you are working in...**

*A dynamic environment where the working environment regularly changes:* worker involvement is fundamental in ensuring risks are effectively managed. How do you support the necessary increased emphasis on the workforce to work in a safe manner?

*Smaller businesses:* Smaller sized businesses tend to have less formal and simple systems in place e.g. face-to-face discussion, toolbox talks, periodic meetings on specific issues. Do your arrangements allow employees to have a say?.

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*Larger Organisations:* Larger organisations are likely to require or have some form of formal system of consultation, although informal systems may be present as well. There will be effective consultation arrangements e.g. an appropriate number of health and safety representatives/ representatives of employee safety, safety committees and meetings for key issues such as organisational changes.

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**PART 3 - DELIVERING EFFECTIVE ARRANGEMENTS FOR MANAGING FOR HEALTH & SAFETY: EXPANDING FURTHER ON 'PLAN, DO, CHECK, ACT'**

This section is focused on those who need to put in place or have particular responsibility to oversee their organisation's arrangements for health and safety. It expands 'Where to start' (Table 2) to give you more information on the actions involved in delivering effective arrangements. It is intended to be used to help address any specific areas requiring attention that are identified as a result of the questions posed in Part 2:

- Plan
  - Policy
  - Planning
- Do
  - Risk Profiling
  - Organising for health & safety
- Check
  - Measuring performance
  - Investigating incidents
- Act
  - Reviewing performance
  - Learning Lessons

***TEXT TO FOLLOW***