

Writing a Health and Safety Policy Statement

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Introduction

This page answers some basic questions about the purpose of a safety policy statement. It gives guidance on writing an effective statement and keeping it up-to-date. At the same time it should help you to check whether you are doing all you are required to do for your employees' health and safety.

This page does not set out to give an authoritative interpretation of the law. The legal requirements themselves are, however, reproduced in full.

This page contains notes on good practices which are not compulsory but which you may find helpful in considering what you need to do.

Why do I need a safety policy?

If you employ five or more people you must, by law, have a written statement of your health and safety policy. This should be your own statement, specific to your firm, setting out your general policy for protecting the health and safety of your employees at work and the organisation and arrangements for putting that policy into practice. The statement is important because it is your basic action plan on health and safety which all your employees should read, understand and follow.

The legal requirement aside, a safety policy statement can bring real benefits. If it is well thought-out, has your backing, commands respect and it is thoroughly put into practice, it should lead to better standards of health and safety. Managers and employees will see the importance of the policy and will be encouraged to co-operate.

What does the law actually require?

Section 2(3) of the Health and Safety at Work etc Act 1974 (HSW Act) states:

“Except in such cases as may be prescribed, it shall be the duty of every employer to prepare and as often as may be appropriate revise a written statement of his general policy with respect to the health and safety at work of his employees and the organisation and arrangements for the time being in force for carrying out that policy, and to bring the statement and any revision of it to the notice of all his employees.”

The only exception prescribed under section 2(3) is that contained in the Employers' Health and Safety Policy Statements (Exception) Regulations 1975 which exempt “any employer who carries on an undertaking in which for the time being he employs less than five employees”. All the employees of an undertaking count for the purposes of this exemption, whether they are employed in one or several sites or establishments. It should also be noted that, for the purposes of these and other health and safety requirements, trainees count as employees of the immediate provider of their workplace training or work experience (unless this is a college or other educational establishment, and the training or work experience is provided on a course run by the college or educational establishment).

Under section 2(3) the written statement must:

- state your general policy on health and safety;
- describe the organisation and arrangements for carrying out your policy;
- be brought to the notice of all your employees;
- be revised whenever appropriate, and every revision must be brought to your employees' attention.

What is meant by a general policy on health and safety?

You should state, in simple terms, what your general aims are with regard to your employees' health and safety. You may wish to refer specifically to the HSW Act and to other health and safety requirements relevant to your work. You will wish to stress the importance of cooperation from your workforce and of good communications at all levels in the firm. You may wish to add that neglect of safety and health requirements will be regarded by you as seriously as behavior leading to avoidable damage to plant, loss of production or any other disciplinary matters, but the primary purpose of the policy is to set out your action plan for health and safety. You or a partner or senior director should sign and date the statement so as to make clear your commitment to the policy.

What is meant by the organisation for carrying out the policy?

It is important to realise that the HSW Act places responsibility for health and safety, with very few exceptions, on you as employer. Many of the duties arising from that responsibility may however have been delegated to managers and supervisors and your statement should show clearly how these duties are allocated. This will become your organisation for safety. Whilst the overall responsibility for health and safety rests at the highest management level, all individuals at every level will have to accept degrees of responsibility for carrying out the policy. Whenever possible, key individuals or their appointments should be named and their responsibilities defined. In a small firm one person may be responsible for all other employees and report direct to you, but in a larger firm, particularly where there are a number of different processes, the structure is likely to be more complex, and diagrams may help to explain it clearly.

It is equally important that employees should be able to see from the statement how they fit into the system, what their own duties are and to whom they should go for advice, to report an accident or a hazard, or to obtain first aid or other help.

What is meant by arrangements for health and safety?

Your statement should describe the systems and procedures for ensuring employees' health and safety. Analyse the activities carried out by your firm. Think of the hazards that could arise. Be certain you know the extent of health and safety matters under your control, including those peculiar to a particular section of your workforce (the night shift, say) both in the normal everyday running of the business and in unusual circumstances (e.g., a power cut or equipment failure). The hazards could then be listed, together with the rules and precautions for avoiding them. You should also cover the arrangements for dealing with injury, fire and other emergencies and your arrangements for providing the instruction, training and supervision necessary to ensure that safe systems are always adopted and adhered to.

In larger firms especially, or those with complex processes, one possible approach is to set these matters out in fairly general terms in the safety policy statement and to refer the reader to other documents for full details, such as works rules, safety checklists, the training programme, and emergency instructions. It may be that not all employees will need to see all these detailed instructions, but the policy statement itself must be brought to the notice of all employees.

Your arrangements for seeing that the rules and precautions are followed by your employees should also be set out. Ways of actually doing this are mentioned in the section entitled [How can I monitor the policy?](#)

The law only requires safety policy statements to cover the health and safety of employees. However, you would do well to set down your strategy for protecting other people who could be put at risk by your activities, such as contractors, customers, and the public. If other people's activities (e.g., those of contractors on your site) could put your own employees at risk, you will in any case need to consider how these risks are to be avoided and to cover this aspect in your statement.

If you have a safety committee, its constitution and terms of reference should be included in this section. Further information on safety committees can be found in the Safety Representatives and Safety Committees Regulations 1977 SI 1977 No 500, and Safety Representatives and Safety Committees booklet (ISBN 0 7176 0419 5), which contains the regulations.

How do I bring the policy to the notice of my employees?

You may already have suitable means of letting your employees know in writing of changes that affect them on other matters, for example by putting a note in their wage packets. If the statement is short each employee can be given a copy and extra copies can be kept for reference, for future employees and to replace lost copies. Where this is not practicable, you may need to post copies up on notice boards. But whatever distribution arrangements you decide on, the same arrangements should apply whenever a revision is issued. Safety representatives are entitled to inspect and take their own copies under Regulation 7 of the Safety Representatives and Safety Committees Regulations 1977.

Publicising the statement will stimulate your employees' interest, especially if the statement and its relevance to them is discussed. They are more likely to play their part if they are convinced of the value you place on their health and safety.

You do not need to provide health and safety inspectors with a copy of the statement unless asked to do so. However, if an inspector visits your premises, he or she may want to check the statement to ensure that it complies with the law. The free leaflet *The Health and Safety Executive — working with employers (HSE26 Rev)* describes the various methods used by health and safety inspectors to secure compliance with the HSW Act and associated legislation.

If part of your workforce does not read English as a native language, you will already have some means of communication established — through bilingual workers, safety signs written in other languages etc., and you will need to see that these workers are acquainted with the safety policy and the parts of any supporting documents relevant to them.

How often should I revise it?

Reviewing the statement keeps it alive. It may need to be revised in the light of experience, or because of new hazards or organisational changes.

The law requires you to revise the statement as often as may be appropriate. Revision may be necessary if the nature of the work that is carried out changes, or new plant or new hazards are introduced into the workplace; if there are changes of personnel or of duties; if new regulations, codes of practice or of official guidance are published relevant to your activities. Depending on the extent of the revision, an amendment slip, an amended page or a whole revised statement may be issued.

How can I monitor the policy?

You will of course wish to check the effectiveness of your statement and the following questions and techniques may be relevant. Are health and safety responsibilities being discharged properly? Are employees keeping to the health and safety rules? Are they more safety-conscious? Has the accident rate improved?

There are various ways of finding out. Spot checks or fuller inspections can be made, perhaps jointly with the safety representative or supervisor. Calling for reports from managers can be a good test of how well they are carrying out their own responsibilities and how far their staff are keeping to safety rules. Reports of all accidents, near-misses and sickness linked to work can and should be studied to see whether they point to a need for greater safeguards or more training, or simply to somebody's failure to act sensibly. A watch should be kept for any trends or patterns in the frequency or type of such incidents.

How long should the statement be?

There is no rule about this. It could be a single sheet of paper, or a leaflet or booklet. A small firm whose activities are not especially hazardous would not need a very long statement. Even a small office will have some potential hazards — trailing wires, electrical equipment and so on — and the arrangements for avoiding accidents and for dealing with injury, fire and emergency should be properly described and seen by those involved.

You may already have some documents which could form part of the safety policy statement, such as work rules, first aid instructions, and instructions for dealing with fire and other emergencies. Make sure you are completely satisfied with them and revise them if necessary; they do not have to be incorporated into the statement so long as the statement refers to them. The checklist in this page will help you to decide whether your statement contains everything it should.

How can I get help in writing the statement?

It is important that the statement should be written, and revised as necessary, by people within your organisation. Managers, supervisors, safety representatives and the safety adviser or safety officer may all have something to contribute; it is an ideal opportunity to involve your workforce and to tap their experience and ideas. If you have a safety committee, this could be a forum for bringing those ideas together and for keeping the statement under review.

Some trade associations and employers' associations have produced guidance which may be of help. If you still feel you need advice on specific points, you should contact your health and safety

inspector. For most industrial businesses the health and safety inspectors concerned will come from the Health and Safety Executive. Their addresses are at the end of this page. Offices, shops, warehouses, restaurants, hotels, etc. are the responsibility of the local authorities. Their health and safety inspectors are usually in the various environmental health departments. However, the duty to write a statement, bring it to employees' notice and revise it as necessary, rests on you as the employer, and you bear responsibility for the contents of the finished statement.

How should the statement be set out?

Again, there is no general rule. Your general policy, organisation and arrangements must all be covered, but it is up to you how you set out the information. The important thing is to think carefully about all the possible hazards and the best ways of dealing with them, and to set out your statement in the way you think will be clearest to your employees, using everyday language.

Remember that to be of any use the statement must be read, understood and acted upon by all concerned. It is often a good idea to include a checklist (see [checklist section below](#)), either in the statement itself or in a separate document referred to in the statement.

In the case of companies engaged in a number of different activities or whose activities are geographically widespread, a single safety policy statement may not be the best solution. An alternative would be to produce a general statement at the most senior level, setting out the main principles, which could then be used as a basis for more detailed statements relating to each unit.

Where the structure of an organisation is such that a number of subsidiaries are themselves employers, each subsidiary would need to issue the 'parent' statement under its own authority as part of its statement. Although a 'parent' statement can be written in broad terms, because the detailed arrangements are described elsewhere, it should not be forgotten that the health and safety arrangements for headquarters' staff should also be dealt with in detail, either in the 'parent' statement itself or in associated documents.

Checklist

The following checklist is intended as an aid in writing and reviewing your safety policy statement. Some of the points listed may be relevant in your case, or there may be additional points which you may wish to cover.

General

Does the statement express a commitment to health and safety, and are your obligations towards your employees made clear?

Does it say which senior officer is responsible for seeing that it is implemented and for keeping it under review, and how this will be done?

Is it signed and dated by you or a partner or senior director?

Have the views of managers and supervisors, safety representatives and of the safety committee been taken into account?

Were the duties set out in the statement discussed with the people concerned in advance, and accepted by them; and do they understand how their performance is to be assessed, and what resources they have at their disposal?

Does the statement make clear that cooperation on the part of all employees is vital to the success of your health and safety policy?

Does it say how employees are to be involved in health and safety matters, for example by being consulted, by taking part in inspections, and by sitting on a safety committee?

Does it show clearly how the duties for health and safety are allocated, and are the responsibilities at different levels described?

Does it say who is responsible for the following matters (including deputies where appropriate)?

- reporting investigations and recording accidents;
- fire precautions, fire drill, evacuation procedures;
- first aid;
- safety inspections;
- the training programme;
- ensuring that legal requirements are met — for example, regular testing of lifts and notifying accidents to the health and safety inspector.

Arrangements that need to be considered

Keeping the workplace, including staircases, floors, ways in and out, washrooms etc. in a safe and clean condition by cleaning, maintenance and repair.

Plant and substances

Maintenance of equipment such as tools, ladders etc. Are they in safe condition?

Maintenance and proper use of safety equipment such as helmets, boots, goggles, respirators etc.

Maintenance and proper use of plant, machinery and guards.

Regular testing and maintenance of lifts, hoists, cranes, pressure systems, boilers and other dangerous machinery, emergency repair work, and safe methods of doing it.

Maintenance of electrical installations and equipment.

Safe storage, handling and, where applicable, packaging, labeling and transport of dangerous substances.

Controls on work that involves harmful substances such as lead and asbestos.

The introduction of new plant, equipment or substances into the workplace — by examination, testing and consultation with the workforce.

Other hazards

Noise problems — wearing of ear protection, and control of noise at source.

Preventing unnecessary or unauthorized entry into hazardous areas.

Lifting of heavy or awkward loads.

Protecting the safety of employees against assault when handling or transporting the employer's money or valuables.

Special hazards to employees when working on unfamiliar sites, including discussion with site manager where necessary.

Control of works transport, e.g., fork-lift trucks, by restricting use to experienced and authorised operators or operators under instruction (and this instruction should deal fully with safety aspects).

Emergencies

Ensuring that fire exits are marked, unlocked and free from obstruction.

Maintenance and testing of fire-fighting equipment, fire drills and evacuation procedures.

First aid, including name and location of person responsible for first aid and their deputy, and location of first aid box.

Communication

Giving your employees information about the general duties under the HSW Act and specific legal requirements relating to their work.

Giving employees necessary information about substances, plant, machinery, and equipment with which they come into contact.

Discussing with contractors, before they come on site, how they can plan to do their job, whether they need equipment of yours to help them, whether they can operate in a segregated area or when part of the plant is shut down and, if not, what hazards they may create for your employees and vice versa.

Training

Training employees, supervisors and managers to enable them to work safely and to carry out their health and safety responsibilities efficiently.

Supervising

Supervising employees so far as necessary for their safety — especially young workers, new employees, and employees carrying out unfamiliar tasks.

Keeping check

Regular inspections and checks of the workplace, machinery, appliances and working methods.