

Policy and Sustainability Committee

10:00am, Tuesday, 9 January 2024

Health and Safety Policy Review

Executive/routine
Wards

Routine

1. Recommendations

- 1.1 It is recommended that the revised Council Health and Safety Policy is approved.

Dr Deborah Smart

Executive Director – Corporate Services

Contact: Chris Lawson, Head of Health, Safety and Risk

Legal and Assurance Division, Corporate Services Directorate

E-mail: chris.lawson@edinburgh.gov.uk | Tel: 0131 529 7476

Report

Health and Safety Policy Review

2. Executive Summary

- 2.1 The new Council Health and Safety Policy (Policy) sets out a commitment to protecting the health, safety and welfare of employees and those persons who engage, interact with, or may be affected by, Council services and/or property. Ensuring health and safety is the starting point to delivering a thriving, sustainable capital city.
- 2.2 The Policy replaces the existing Corporate Health and Safety Policy. The policy updates key responsibilities in order to clarify governance of health and safety, reflecting the current organisational arrangements within the City of Edinburgh Council.

3. Background

- 3.1 The Health and Safety at Work etc. Act 1974 requires employers to prepare, in writing, a statement of their general policy with respect to the health and safety at work of their employees; and the organisation and arrangements for carrying out the policy. It also requires the statement to be brought to the attention of all employees.

4. Main report

- 4.1 The proposed new Policy replaces the existing Corporate Health and Safety Policy. It gives greater clarity on roles and responsibilities and defines, in greater detail, the Health and Safety governance and assurance processes within the City of Edinburgh Council.
- 4.2 The Policy applies to all employees and to all third parties who interact/engage with Council services but are not employees.
- 4.3 The Policy Statement sets out the Council's commitment to health and safety, recognising that this is the starting point to delivering a thriving, sustainable capital city.
- 4.4 The Policy content sets out requirements for health and safety which must be met to ensure that those who create or are responsible for risk are accountable for controlling that risk.

- 4.5 The key changes compared with the existing Corporate Health and Safety Policy are as follows:
- a) Policy statement - In the Policy, the Policy Statement confirms the intent of the employers (elected members as “the Council”) in relation to the health and safety of their employees and those affected by their undertakings and the governance and assurance in place to support this intent.
 - b) Policy content - The Policy confirms the organisation and management arrangements to ensure the health and safety of employees and those affected by the Council’s undertakings, recognising the Council will adopt best practice, when identified, and that statutory compliance will be regarded as the minimum expected performance standard.
 - c) Roles and responsibilities - Health and safety roles and responsibilities in the Policy reflect the current Council management structure, and defines, in greater detail, the responsibilities/accountabilities for key roles.

5. Next Steps

- 5.1 The Policy, once approved, will be formally communicated and disseminated to all Council employees, including duty holders and others with key identified responsibilities.
- 5.2 This Policy will be reviewed every three years or when legislation or as and when best practice materially changes. The next review is scheduled for January 2027.

6. Financial impact

- 6.1 The Policy does not affect existing financial arrangements.
- 6.2 Failing to manage health and safety effectively can create financial and other risks.

7. Equality and Poverty Impact

- 7.1 The requirement to protect all people irrespective of their characteristics is clearly set out within health and safety law. The Council therefore seeks to respond accordingly. Where there is a need to make special provision to ensure all employees are protected and supported this will be set out within supporting Management Arrangements and supporting guidance.

8. Climate and Nature Emergency Implications

- 8.1 The measures set out within this report and the Health and Safety Policy do not have a positive or negative impact on the climate and nature emergency. However, it is acknowledged that changes in climate will present a risk factor which will require continued assessment in order to ensure its affects in terms of risk to

employees at work or affecting activities of the Council are adequately considered and responded to.

9. Risk, policy, compliance, governance and community impact

- 9.1 This policy is concerned primarily with management of health and safety risk. The Policy sets out the broad principles of the approach taken by the City of Edinburgh Council in order to protect its employees, citizens and others who can be affected by the way it works.
- 9.2 This Policy and supporting arrangements will directly contribute to the successful management of health and safety, through setting out clear governance associated with the management of key health and safety risks.

10. Background reading/external references

- 10.1 Accessible online resources:
- a) [Health and Safety at Work etc. Act 1974](#)
 - b) [The Management of Health and Safety at Work Regulations 1999](#)
 - c) RIDDOR - [Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013](#),
 - d) [Safety Representatives and Safety Committees Regulations 1977 \(as amended\), Legislation](#)
 - e) [Health and Safety \(Consultation with Employees\) Regulations 1996](#)

11. Appendices

- 11.1 Appendix 1 - The City of Edinburgh Council Health and Safety Policy

Council Health and Safety Policy

Implementation date: 09 January 2024

Control schedule

Approved by	Policy and Sustainability Committee
Approval date	09.01.2024
Senior Responsible Officer	Dr Deborah Smart, Executive Director of Corporate Services
Author	Chris Lawson, Head of Health, Safety and Risk
Scheduled for review	January 2027

Version control

Version	Date	Author	Comment
0.1	28 Mar 2017	Susan Tannahill	The existing Corporate Health and Safety Policy will be superseded.
0.2	15 May 2018	Susan N. Tannahill	Amendment to Policy Statement in 1.1.
0.3	01 Dec 2020	Robert H. Allan	The existing Corporate Health and Safety Policy will be superseded.
0.4	09 Jan 2024	Chris Lawson	The existing Corporate Health and Safety Policy will be superseded.

Subsequent committee decisions affecting this policy

Date	Committee	Link to report	Link to minute
-------------	------------------	-----------------------	-----------------------

Council Health and Safety Policy

1. Foreword

- 1.0 The City of Edinburgh Council (Council) regards the health, safety and wellbeing of employees, service users and visitors as an integral part of pursuing its mission of excellence in the provision of public services to the community in Scotland's dynamic, festival, capital. Accordingly, it is committed to enabling employees to pursue organisational activities safely by targeting resources proportionate to the risks; ensuring that employees and those others who engage with the Council, are properly protected.
- 1.1 This policy seeks to ensure that those who create and/or are responsible for risks manage them responsibly and understand that failure to manage real risks responsibly and proportionately can have broad ranging consequences. This enables individuals to understand that as well as the right to protection, they also have to undertake activity responsibly and without risk to others.

2. Policy Statement

- 2.0 The City of Edinburgh Council is committed to providing a safe and healthy place of work where employees are confident that their health and safety is considered to be of the utmost importance at all times. The Council is also committed to providing a safe and healthy environment for others who may be affected by Council activities such as service users, volunteers, contractors, etc.
- 2.1 To maintain and further develop a strong council-wide health and safety culture, it is essential that all managers and employees are equipped with the skills, knowledge, confidence and capacity to deal effectively with health and safety issues in support of the Council's strategic objectives and ambitions. In satisfying this commitment it is the policy of Council, so far as is reasonably practicable to:
- a) allocate adequate resources to health and safety at all levels;
 - b) provide and maintain plant and systems of work that are safe and without risks to health;
 - c) make arrangements to ensure the safe use, handling, storage, transport and disposal of articles and substances is safe and without risks to health;
 - d) provide appropriate information, instruction, training and supervision to ensure that all employees have the knowledge and competence they need to meet their individual and collective responsibilities;
 - e) maintain any place of work (or premises under Council control) in a condition that is safe and without risks to health and to provide and maintain safe means of access to and egress from them;
 - f) provide and maintain a working environment for employees that are safe, without risks to health, and adequate as regards facilities and arrangements for their welfare at work;

- g) assess the risks to the health and safety of its employees and others who may be affected by its undertaking and ensure that control measures are implemented to reduce risk by applying the principle of eliminate, substitute to deliver collective protection in favour of individual protections;
 - h) ensure risk assessments and other safety protocols, i.e. local safety procedures and guidance, safe systems of work, etc. are reviewed annually, or as agreed with Service Directors;
 - i) to provide such protective equipment as a result of risk assessment for the health and safety of employees;
 - j) adopt a collaborative approach between trade unions, staff health and safety representatives and management on health and safety issues;
 - k) cooperate and coordinate on health and safety arrangements with other employers where there are shared facilities or activities;
 - l) to monitor the effectiveness of health and safety provisions through sound governance and assurance arrangements; and
 - m) ensure that the Council has access to competent specialist advice for health and safety.
- 2.2 This Policy will be made available to all employees and/or other persons working under the control of the Council or interested third parties (organisations), on request.
- 2.3 This Policy is supported by a Health and Safety Strategy which sets out key developments of the Council Health and Safety system in order to build and further develop the City of Edinburgh Council's approach to the successful management of health and safety.
- 2.4 This policy will be further supported by a suite of health and safety management arrangements, procedures and guidance as required to ensure that the City of Edinburgh Council has clearly set out how it will respond to the broad range of health and safety obligations placed on it. These health and safety arrangements will be published and maintained on the Council health and safety [Orb](#) pages.

3. Scope

- 3.0 The City of Edinburgh Council's Health and Safety Policy (and associated policies and Management Arrangements and guidance) applies to all employees, premises and activities falling, to any extent, under the Council's control. In addition, the Policy extends to third parties (organisations) who interact with Council services but are not employees such as members of the public, contractor(s) and service user(s).

4. Roles and responsibilities

- 4.0 The Council will organise its health and safety arrangements around existing organisational governance and assurance structures and will ensure the provision of robust leadership and management systems, with clearly defined roles and responsibilities, for health, safety and wellbeing risks.
- 4.1 **The City of Edinburgh Council/Elected Members**

The City of Edinburgh Council, as the governing body and employer, has the overall statutory responsibility for occupational health and safety in the Council. Elected Members have a duty to consider health and safety in the course of approving policy and strategy and reviewing the Council's occupational health and safety performance.

Specifically, the Council will ensure:

- a) appropriate governance, communications and assurance systems are put in place to support this policy, including its review and development;
- b) awareness of significant health and safety risks faced by the Council; and
- c) oversight of the health and safety implications of strategic decisions.

Elected members will seek assurances from the Chief Executive Officer that: -

- d) the Council health, safety and wellbeing arrangements are adequately resourced;
- e) risk control measures are in place and appropriately acted upon;
- f) there are effective processes to ensure training and competency;
- g) there are suitable processes for monitoring health and safety performance;
- h) there is access to competent health and safety advice; and
- i) there is a process for employees or their representatives to be involved and engaged in decisions that affect their health and safety.

Elected members will receive, and reasonably evaluate, performance metrics relevant to health and safety, and where appropriate, be provided with data on process (*preventive and maintenance*) and competency indicators.

4.2 **Chief Executive and Corporate Leadership Team**

The Chief Executive has delegated authority from the City of Edinburgh Council for the delivery, management and performance of this health and safety policy and is supported in this by the Executive Directors who form the Council's Corporate Leadership Team along with other relevant officers who are in attendance at that group.

Additionally, the Chief Executive and the CLT shall:

- a) implement and endorse this Policy as a visible demonstration of ownership and ensure its values are communicated;
- b) agree how this policy will be measured, monitored and reported through the setting of appropriate key performance indicators and to review such performance data, celebrating achievement and taking corrective action where targets are not being met;
- c) allocate suitable resources for the management of health and safety;
- d) establish, define membership, chair and maintain a health and safety group/committee, as outlined in the governance and assurance arrangements;
- e) regularly communicate/meet with the Head of Health, Safety and Risk;
- f) ensure that an occupational health service is integrated into the health, safety and wellbeing management system;
- g) determine a health, safety and wellbeing risk profile for the Council and agree an appropriate internal auditing program to reflect this profile;
- h) ensure emergency procedures encompass all relevant risks;
- i) consider the health, safety and wellbeing implications of strategic decisions such as large projects etc.; and

- j) review health, safety and wellbeing performance on an annual basis and share such results with employees.

4.3 **Executive Directors**

Executive directors, in addition to their CLT role, are accountable for implementation and compliance with the Policy across their Directorate/Divisions and areas of responsibility.

Specifically, they will ensure that:

- a) adequate resources are provided within their Directorate to effectively implement this Policy;
- b) health and safety roles, responsibilities and accountabilities are communicated, understood and executed in their Directorate, and areas of responsibility (including cross-service roles and responsibilities), are appropriately included in personal objectives;
- c) effective arrangements for planning, controlling and monitoring/reviewing preventative and protective measures for health, safety and welfare are in place;
- d) a health and safety training needs analysis is undertaken, including induction training and refresher training, where appropriate;
- e) governance processes, and oversight, for health and safety are effectively implemented in their service areas;
- f) there is suitable and sufficient consultation in their service areas with employees and Trade Unions to encourage their commitment to, and engagement in, health and safety matters, including contributing to the risk assessment process and giving notice of any enforcement notices within their respective service areas;
- g) reviews of health and safety performance are undertaken on a regular basis and following any adverse event, as appropriate, directing action where required;
- h) incident escalation arrangements are in place and communicated; and
- i) there are arrangements in place to assure the Chief Executive and CLT that the Policy is fully complied with.

Executive Directors are also responsible for ensuring that their Directorate is represented at the Council Health and Safety Group by a member of their senior management team appropriately empowered on their behalf.

4.4 **Executive Director of Corporate Services**

In addition to 4.3 above, the Executive Director of Corporate Services reports to the Chief Executive on the development of strategies that support the Policy.

In particular, this role has the additional responsibility for:

- a) advising CLT on current and future health and safety requirements;
- b) ensuring that the Policy, strategy and objectives reflect the Council's business priorities;
- c) ensuring that a safety management framework is in place, to enable the appropriate health and safety policies and procedures to be developed, maintained, monitored and reviewed;
- d) ensuring that sufficient competent health and safety resources are provided to enable the development of the Policy, strategy, supporting health and safety policies, provision of technical advice and management of incident;

- e) ensuring that appropriate general health and safety information and training is provided to management employees including training to update and refresh;
- f) informing the Chief Executive on organisational health and safety performance, and significant incidents and issues; and,
- g) ensuring that the Council policies and supporting mechanisms for managing risk facilitate the management of health and safety risks and identification of non-compliance.

4.5 **Service Directors**

Service Directors are responsible for overseeing all aspects of the day-to-day operation of the Policy within the areas under their control, to support their Executive Director and CLT as a whole.

Specifically, they are responsible for:

- a) forming and implementing health and safety plans within their area of control to deliver the Policy, strategy and objectives;
- b) ensuring health and safety hazards are identified and risks are assessed and eliminated/appropriately controlled;
- c) providing and maintaining of plant and systems of work that are safe and without risks to health;
- d) ensuring that appropriate health and safety training is provided to management and employees;
- e) ensuring that a premises/site health and safety duty holder is appointed (or other appropriate nominee) for all properties under their area of responsibility;
- f) ensuring adequate consultation arrangements are in place for recognised trade unions;
- g) ensuring that a multi-occupied premises health and safety duty holder is appointed (or other appropriate nominee) for all multi-occupied properties where their service area has the greatest number of employees based in the building; and
- h) assuring their Executive Director that the Policy is being complied with.

4.6 **Service Director, Operational Services**

The Service Director, Operational Services has overall accountability for non-domestic property related health and safety matters, except for properties managed by third party contractors on behalf of the Council, and leased properties, as appropriate:

Specifically, this role holder will;

- a) ensure compliance with health and safety requirements including statutory obligations, i.e. asbestos management, fire arrangements, control of legionella etc.;
- b) conduct and compile a comprehensive suite of records of fire risk assessments/inspections, asbestos registers/management/demolition/refurbishment surveys and plans, water quality control inspections and reports, etc. to be held both centrally and on site for property and facilities management, duty holder and enforcing authority purposes; and
- c) ensure adequate 'control of contractors' arrangements, including access to, permit to work and confined space working systems, etc. are in place to

discharge (a) – (c) above.

4.7 **Service Director, Sustainable Development**

The Service Director, Sustainable Development has specified responsibilities for non-domestic property related health and safety matters, except for properties managed by third-party contractors on behalf of the Council, and leased properties, as appropriate:

Specifically, this role holder will;

- a) be responsible for the design, construction, installation, decommissioning, demolition and refurbishment, as appropriate, of the Council's non-domestic property portfolio, and
- b) ensure that roles and responsibilities are set out and adhered to in lease and sub- lease agreements, including maintenance and repair obligations, fire safety, asbestos and legionella management, etc.

4.8 **Service Director, Housing and Homelessness**

The Service Director, Housing and Homelessness has responsibility for Council housing (domestic/residential) property related health and safety matters:

Specifically, this role holder shall, in relation to domestic/residential property under their control;

- a) be responsible for the design, construction, installation, security, maintenance, inspection, decommissioning, demolition, refurbishment and cleaning, as appropriate, of the Council's domestic/residential housing portfolio, ensuring compliance with health and safety requirements including statutory obligations, i.e. asbestos management, fire safety, control of legionella etc.;
- b) conduct and compile a comprehensive suite of records of fire risk assessments/inspections, asbestos registers/management/demolition/refurbishment surveys and plans, water quality control inspections and reports held both centrally and on site, where appropriate, for duty holder purposes;
- c) ensure adequate 'control of contractors' arrangements, including access to, permit to work and confined space working systems, etc. are in place to discharge (a) and (b) above;
- d) responsible for the provision of information and guidance to occupiers of the Council's housing portfolio to ensure their safety; and
- e) ensure that all persons and contractors engaged in the Council's domestic/residential housing portfolio are competent and aware of their responsibilities in relation to health and safety whilst on Council property.

4.9 **Service Director, Human Resources**

In terms of this Health and Safety Policy, the Service Director - Human Resources supports employee wellbeing and has responsibility for ensuring:

- a) the adequate provision of Occupational Health Services, including pre-employment health screening, medicals, vaccinations⁴, health surveillance, etc. in consultation with Corporate Health and Safety;
- b) the adequate provision of Employee Assistance support;

- c) appropriate people policies and procedures are developed, maintained and monitored for work-related stress, driving at work and alcohol and drugs;
- d) in association with Corporate Health and Safety, making available health and safety training for employees; and
- e) the provision of health promotion initiatives within the Council to promote employee health and wellbeing.

4.10 **Head of Internal Audit**

Whilst corporate health and safety provides second line, local, operational health and safety audit/assurance, third line assurance is delivered through the Internal Audit team and external assurance suppliers providing a higher level of organisational scrutiny and assurance.

Where appropriate, the Head of Health, Safety and Risk will consult the Head Internal Auditor where significant or emerging health and safety risk is identified and require audit intervention outwith the above audit programme, as agreed.

4.11 **Head of Health, Safety and Risk**

The Council Head of Health, Safety and Risk is the Council's appointed 'competent person' in regard to health and safety assistance.

The Head of Health, Safety and Risk role is to ensure that the health and safety of employees and those that engage with Council are not adversely affected by Council activities or processes, so far as is reasonably practicable, whilst promoting the highest quality of health and safety practice and continuous improvement across the Council's wide spectrum of activities; thereby meeting all its legal obligations in this regard.

Specifically, this role holder is accountable for;

- a) defining the content of this Policy (and supplementary health and safety arrangements), and reviewing on a three yearly basis (or sooner where deemed necessary), and updating as necessary;
- b) providing guidance, interpretation and materials as required, to help achieve compliance with this Policy;
- c) defining the minimum required compliance information/metrics that should be used to continually evaluate performance, and reporting onwards appropriately;
- d) ensuring consultation with employees and their representatives on health and safety matters;
- e) engaging other competent people as appropriate to ensure appropriate expertise within the Council;
- f) being the primary point of contact with external health and safety regulatory bodies and agencies; and
- g) providing health and safety performance reports to support routine performance monitoring and the annual health and safety review process.

4.12 **Principal Health and Safety Adviser**

The Principal Health and Safety Adviser will deputise for the Head of Health, Safety and Risk in relation to the Council's appointed 'competent person⁵' in regard to health and safety assistance.

The Principal Health and Safety Adviser supports the Head of Health, Safety and Risk to ensure that the health and safety of employees and those that engage with Council is not adversely affected by Council activities or

processes, so far as is reasonably practicable, whilst promoting the highest quality of health and safety practice and continuous improvement across the Council's wide spectrum of activities; so meeting all its legal and moral obligations in this regard.

4.13 **Senior Health and Safety Advisers and Corporate Health and Safety Advisers**

The Senior Health and Safety Advisers and Corporate Health and Safety Advisers support and assist the Principal Health and Safety Adviser and Head of Health, Safety and Risk to ensure that the health and safety of employees and those that engage with the Council is not adversely affected by Council activities or processes, so far as is reasonably practicable.

Specifically, these health and safety advisers will;

- a) support and advise directorates, divisions, localities and employees as health and safety 'competent persons', including provision of health and safety training;
- b) monitor compliance with this Policy by collating compliance information and metrics, and reporting onwards appropriately;
- c) undertake health and safety audits to evaluate compliance with this Policy, and recommending action required to meet the required standards; and
- d) investigate adverse events - incidents, accidents, injuries, work related ill-health as appropriate, and liability claims, with specialist input where required.
- e) Will stop any activity where they deem there to be a serious or imminent risk of harm.

N.B. The Head of Health, Safety and Risk, Principal Health and Safety Adviser, Senior Health and Safety Adviser and Advisers shall, on behalf of the elected members and Chief Executive/CLT, have full access to any record, document, person or premises and is authorised to take any reasonable emergency/critical actions thought necessary to ensure the health, safety and wellbeing of all persons, employed or engaging with the Council and for the protection of Council physical assets and reputation, at any reasonable time.

4.14 **Premises/site Health and Safety Duty Holder**

In addition to normal managerial duties, employees who have control of premises or sites as part of their role shall undertake statutory health and safety related duties. Technical support for these duties will be provided by the property and facilities management team but the management and oversight of the duties are the responsibility of the Duty Holder. Nominated employees will be assigned duty holders in particular properties, i.e. City Chambers, Waverley Court, etc.

At premises/site level, the most senior manager/employee (duty holder) within the Service Area with the greatest number of employees in the building, e.g. Head Teacher, Care Home Manager, Depot Manager, etc. is responsible for overseeing all aspects of the day-to-day operation of the Policy within the premises/site under their control, a list of premises Duty Holders will be maintained on the Council Health and safety Orb pages. Duty Holders will ensure:

- a) all health, safety and welfare risks under their management are identified,

- assessed and controlled, with specialist input from corporate health and safety advisers, the Fire Safety Team and others, where required;
- b) that the requirements in this Policy are communicated and followed by all employees and third parties (organisations), including service users;
 - c) health and safety training needs analysis is carried out, and suitable training is delivered within appropriate timescales, including induction training;
 - d) that workplace inspections are carried out every six months or sooner if requested by trades unions (termly in schools), and that these are documented and, where required, remedial action is acted upon and delivered within appropriate timescales;
 - e) the reporting and primary investigation of adverse events or conditions – injuries, work-related ill health, diseases, dangerous occurrences ('near misses'); and any premises/plant/equipment hazards, damage or defects (corporate health and safety shall conduct significant adverse event investigations, as appropriate); and
 - f) adverse event escalation arrangements are in place and communicated.

4.15 **Multi-occupied Building or Multi-occupied Site Health and Safety Duty Holder**

In Council premises/sites occupied by multiple council service areas, in addition to their normal managerial responsibilities, the most senior manager/employee with the largest number of staff on site shall be responsible for the co-ordination and co-operation, where required, of health, safety and fire responsibilities that cross service area boundaries in the premises or site, including:

- fire alarm weekly testing
- fire / other evacuations
- fire wardens
- first-aiders
- health and safety records (e.g. fire safety, asbestos, water safety, electrical safety, statutory testing of equipment, etc.)
- incident/adverse event escalation.

In buildings where the Council own/operate part of the relevant building/site with other third parties (organisations), the most senior manager/employee with the largest number of staff on site will liaise with other occupiers to agree health and safety local duty holder responsibilities. This can result in a 3rd party co-ordinating the Duty Holder response in co-operation with Council Managers.

4.16 **Line Managers/Supervisors**

Employees that manage employees in any capacity are responsible for promoting good health and safety practices in the workplace, challenging inappropriate behaviours and recognising good practices within their teams.

Additionally, line managers/supervisors shall ensure, for their direct reports and others under their management control, that:

- a) the Policy and supporting policies, health and safety arrangements and guidance documents are understood and followed;
- b) health and safety goals and/or measures are set;
- c) all health and safety risk are identified, assessed, controlled/mitigated and reviewed, as appropriate, with specialist input from corporate health and

- safety advisers and others including the Council occupational health provision, where required;
- d) they do not proceed with any activity where the risks cannot be adequately controlled;
 - e) health and safety training is conducted/arranged in accordance with their specific training needs analysis, and records are maintained;
 - f) there is adequate supervision and monitoring of work activity to ensure individual and group health, safety and welfare;
 - g) the reporting and investigation of all adverse events or conditions – injuries, work-related ill-health, diseases, dangerous occurrences ('near misses') and any premises/plant/equipment hazards, damage or defects; and
 - h) appropriate, engagement, consultation and co-operation with on-site Trade Union representatives (if trade unions are not on site then information should be passed to the respective Trade Unions, where appropriate).

4.17 All Employees

Everyone has a responsibility for their own health and safety, as well as that of others who may be affected by their work, things they do or fail to do (acts or omissions). Everyone has the right not to proceed with any activity if they feel it poses imminent danger to their safety or that of others, and they must immediately raise their concerns with their line manager.

Employees will:

- a) take reasonable care of themselves and cooperate with the Council on health and safety matters;
- b) carry out their work safely and in accordance with this Policy, protocols, local arrangements/procedures or any relevant legislation;
- c) follow the requirements of the risk assessment and implement any identified control measures, i.e. personal protective equipment, safe systems of work, etc.;
- d) report any personal injury and work-related ill health, and accident or incident (including 'near misses') as soon as is reasonably practicable to their line manager, and assist with any subsequent investigation, including co-operating fully with the provision of witness statements and any other evidence that may be required;
- e) report any faulty, damaged or unsafe equipment or unhealthy working conditions/practices or to their line manager/supervisor;
- f) notify their line manager if they have a condition affecting their health which may be caused by, or made worse by, work activities;
- g) undertake any health surveillance/screening, as required, for their particular role;
- h) undertake health and safety training and induction, when required;
- i) use equipment only for its intended purpose;
- j) not to interfere with, or misuse, anything provided for health and safety purposes;
- k) on discovering a fire, raise the alarm - if the emergency alarms sound, leave by the nearest emergency exit and report to assembly points, as per local fire arrangements;
- l) notify their line manager in advance to set up a Personal Emergency Evacuation Plan (PEEP) if they will need assistance or special arrangements to evacuate;
- m) not damage the fabric of the building, or connect directly to the services -

- other than through a standard electrical socket - without prior agreement from property and facilities management; and
- n) bring any breaches of this Policy, protocols or local health and safety arrangements to the attention of their line manager or corporate health and safety advisers.

4.18 **Third Parties (Organisations)**

It is important that when third parties (organisations) engage with the Council services or premises that the Council host informs and requires them to adopt the standards set out in this Policy.

In particular they shall be required to;

- a) take care of their own health and safety and others who may be affected by their acts or omissions;
- b) co-operate with Council instructions, safe systems and procedures;
- c) reporting any hazards, damage or defects to equipment or Council property/premises/vehicles immediately to the host;
- d) report any personal injury and work-related ill health, and accident or incident (including 'near misses') immediately to the person in charge/host and assist with any subsequent investigation, including co-operating fully with the provision of witness statements and any other evidence as may be required; and
- e) Inform their host of they have any special need or requirement for their personal safety (relevant protected characteristic) whilst engaging with the Council.

4.19 **Contractor Management**

In addition to 4.18 above, it is the responsibility of the contract owner within the service area to manage and control the activities of contractors.

Specifically, contract owners shall:

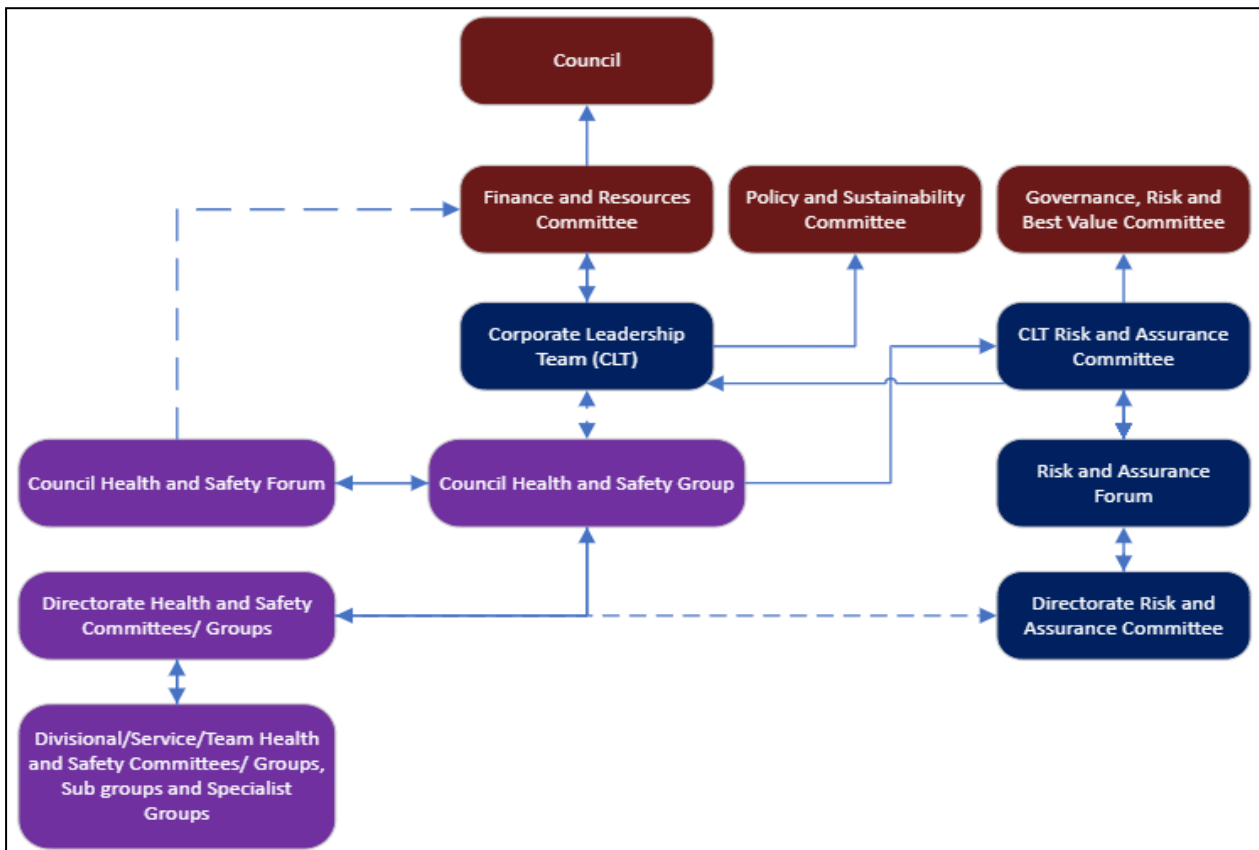
- a) ensure that contractors have undergone appropriate and robust checks, and are deemed competent, suitable and fit to undertake work for the Council;
- b) provide contractors with all necessary information, including this health and safety Policy and relevant procedures;
- c) ensure that all contractors have provided the necessary health and safety control documents (e.g. health and safety risk assessments, method statements, survey reports, etc.);
- d) plan, resource, manage and supervise the contract, as appropriate, (including operating an access/permit to work, etc. system), proportionate with the level of risk;
- e) comply with the requirements of the Construction (Design and Management) Regulations 2015, where appropriate;
- f) ensure that all contractor personnel co-operate with any incident investigation on the part of the Council, including the provision of witness evidence; and
- g) inform their Council contract owner of they have any special need or requirement for their personal safety (relevant protected characteristic) whilst engaging with the Council.

5. Health and safety governance and assurance

- 5.0 The Council employs a mature governance structure supported by an assurance methodology based upon the Institute of Internal Auditors (IIA) ‘Three Lines’ model⁶.
- 5.1 A formal structure (framework) of committees is in place that governs how the Council operates safely – reflecting the vision, aspiration, community objectives/ambitions and decisions of elected members, supported by the chief executive officer and executive directors. Health and safety issues are raised, discussed/consulted upon and escalated to the Council Health and Safety Group, where required.

Fig 1: The City of Edinburgh Council Health and Safety Governance Framework 2024

- 5.2 The groups forming the ‘Three Line’ assurance methodology within the Council are interdependent upon each other. In this model, **management’s**



responsibility is to achieve organisational aims and objectives, planning and directing service activity for both first and second line roles.

- **Line one roles** [“doers”] are most directly aligned with the delivery of services to the community and internally to other service users. These roles maintain the responsibility for managing operational risk – controlling the risk they create.
- **Line two roles** [“helpers”] support line one roles by maintaining policies, frameworks and providing assurance, assistance and support with managing risk. Some second line roles may be specialist to provide complementary

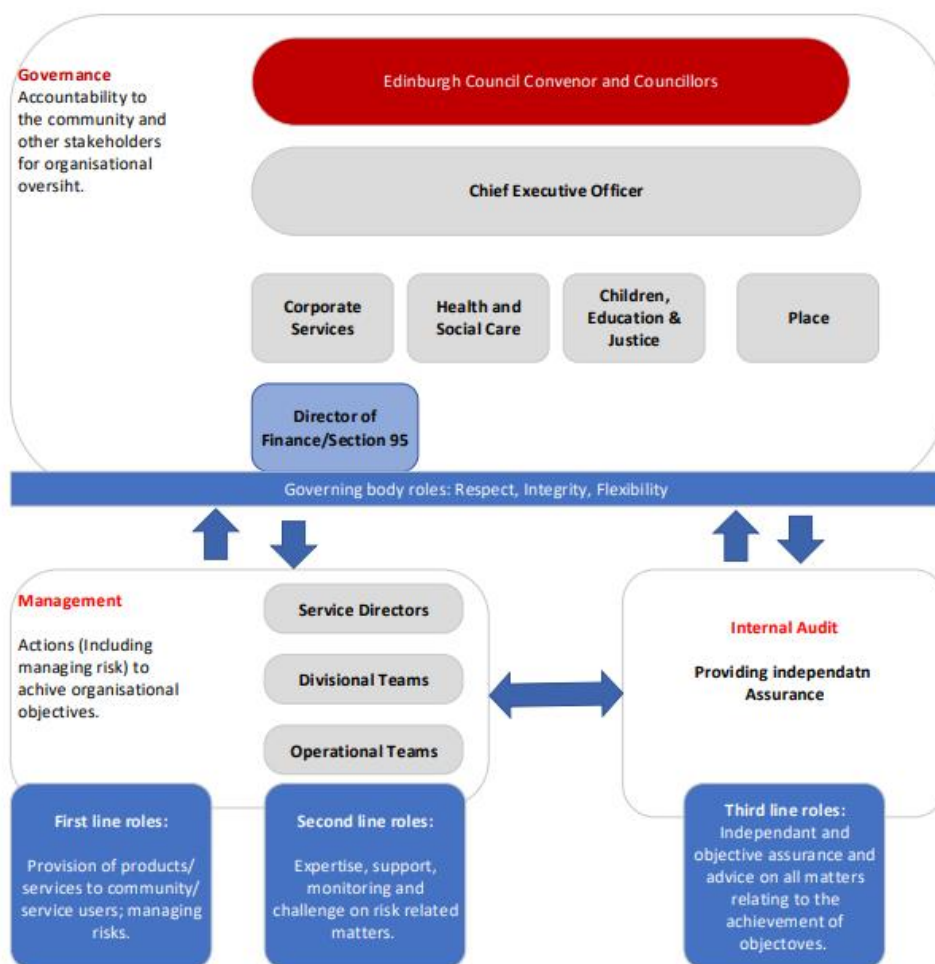
expertise or may focus on specific provisions such as compliance with laws, information and technology, etc. First and second line roles may be distinct or blended.

- **Line three roles** [“checkers”] provide independent, objective, internal and external assurance and advice on the adequacy and effectiveness of governance and risk management, through the competent application of systematic and disciplined processes, expertise, and insight. It reports its findings to management and the governing body.

Fig 2: Three Line Audit/Assurance Model – the City Of Edinburgh Council 2024

5.3 Council Health and Safety Group

The Council health and safety group is chaired by the Chief Executive Officer or a nominated deputy. The purpose of this group is to;



- review and recommend (or otherwise) the Policy, and the risk appetite statement and tolerances for approval;
- approve the Council health and safety strategy;
- provide oversight for health and safety across the Council; and
- monitor health and safety performance and compliance with the Policy,
- directing action where required.

5.4 **Council Health and Safety Group Members**

Council health and safety group members who represent a service area are individually responsible for:

- a) promoting visible commitment to the health and safety agenda;
- b) leading the implementation of the Policy in their service area;
- c) incorporating Council health and safety strategy, relevant deliverables, key performance (quality) indicators and targets into service area plans, where appropriate;
- d) ensuring decisions and actions from the Council health and safety group are cascaded to their senior management team;
- e) ensuring that their senior management team is updated on health and safety performance and risks/issues in their service area;
- f) reporting health and safety performance and risks/issues to the Council health and safety group, on a quarterly basis; and
- g) ensuring that the Council health and safety group is provided with all necessary health and safety information, to enable it to fulfil its remit.

5.5 **Council Health and Safety Forum**

The Council will operate Directorate Health and Safety Committees in accordance with the Safety Committee Regulations. Where Trade Union Health and Safety Representatives wish to escalate matters beyond a Directorate, they can do this by escalating items to the Council Health and Safety Group to respond to. Trade Union Health and Safety Representatives also have the opportunity to escalate items to elected members for the City of Edinburgh Council through the Health and Safety Forum and to bring matters to their attention which require member support.

5.6 **Health and Safety Committees/Groups**

The Council recognises the importance of joint consultation with recognised Trade Unions, and the valuable input of safety representatives in the Council health and safety Committees/Groups to promote health and safety.

The remit of employees on the Council health and safety committees/groups is:

- a) to reflect and communicate their member's health and safety concerns; discharging their roles, as defined in the appropriate safety representative legislation;
- b) to promote a low tolerance approach to health and safety risks;
- c) to consider, review and make recommendations to the Head of Health, Safety and Risk and/or Council health and safety group on health and safety matters;
- d) to assist in the development of Council Policy, Arrangements, procedures and guidance on matters relating to health and safety at work; and
- e) to raise awareness of Council health and safety initiatives.

6. **Review**

- 6.0 In line with the Council's Policy Framework this policy will be reviewed every three years or more frequently if required if legislation or best practice materially changes.

Appendix 1 Policy approval process



Appendix 2
Management Arrangement Approval Process

