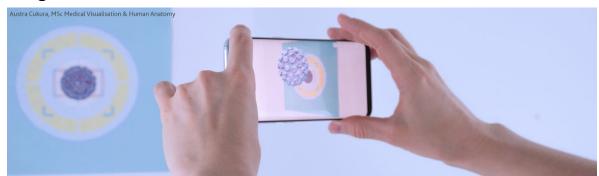


## The Glasgow School of Art

# OCCUPATIONAL HEALTH AND SAFETY POLICY ARRANGEMENTS

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#### Policy Control

Policy Control	
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	Policy
	University of Brighton, Occupational Health and Safety Policy.
	Imperial College London, Health and Safety Policy.



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#### 1. Introduction

#### 1.1 Terminology

The Occupational Health and Safety Management System (OHSMS) refers to the organisation, procedures and systems that GSA and constituent academic and professional support areas are required to establish and maintain for ensuring the occupational health and safety of students, staff and others who could be affected by its undertaking.

**Occupational Health and Safety (OHS).** This deals with the safety, health, welfare and wellbeing of people when they are at work. For convenience and clarity this may be abbreviated to Health and Safety (H&S).

**Occupational Health (OH)** is a medical speciality that deals with how work and the work environment can impact on workers' health, both physical and mental. It also includes how workers' health can affect their ability to do their job. The two subject areas are sometimes confused with each other and there are overlaps with H&S. However, where an occupational disease, illness or condition is identified or where risk assessment identifies a need for health surveillance this will be referred to the OH provider that GSA have engaged via the <a href="https://example.com/human-Resources-Department">https://example.com/human-Resources-Department</a>.

Work is defined as the activities that you carry out for the GSA. This includes study and teaching.

#### 1.2 The GSA Occupational Health and Safety Policy and arrangements

Health and safety is one of the GSA's core management and operational functions.

The GSA's Health and Safety Policy (H&S Policy) commits the GSA to ensuring the health and safety of its students, staff visitors, and all others who may be affected by its activities. The H&S Policy also supports and empowers the OHS Policy arrangements document.

Under the GSA's H&S Policy, the overall responsibility for health and safety at the GSA rests with the Board of Governors. The Director is the senior manager responsible for health and safety and reports to the Board of Governors. The Director is supported by the Senior Leadership Group.

All Senior Leadership Group members are required to embrace the aims and objectives of the H&S Policy and to implement the arrangements described in this document to ensure the aims and objectives are fulfilled.

The Occupational Health and Safety Policy Arrangements (this document) provides level 1 information on how the policy and health and safety management system will be implemented at the GSA. These are general arrangements which will be applicable to most students and staff at the GSA and should be read in conjunction with the H&S Policy.

#### 1.3 The GSA Occupational Health and Safety Management System (OHSMS)

The GSA has adopted the Occupational Health and Safety Management System (OHSMS) advocated by the Health and Safety Executive in their Publication Managing for Health and Safety (HSG65), which facilitates the provision of a robust framework enabling the GSA to promote a positive occupational health and safety culture and to affect a continuous cycle of improvement. See Figure 1 below



Figure 1: Plan Do Check Act cycle



Reference <a href="https://www.hse.gov.uk/pubns/books/hsg65.htm">https://www.hse.gov.uk/pubns/books/hsg65.htm</a>

The Plan, Do, Check, Act cycle supports a balance between the systems and behavioural aspects of management and ensures that health and safety management is an integral part of the GSA's good management generally. Staff at all levels have a clear role in contributing to the successful management of health and safety at the GSA.

#### Plan

The GSA's Occupational Health and Safety Policy expresses a clear statement of what we want to achieve as an organisation and our commitment for managing health and safety. It creates a framework for accountability that is led and adopted by senior management and contributes to the delivery and success of the GSA's strategic aims.

The organisational structure for managing health and safety is defined in the arrangements which support and are empowered by the policy. Responsibilities are clearly allocated and everyone at the GSA is involved. The arrangements for ensuring competence, training and consultation are also set out in the arrangements.

#### Do

The H&S Policy arrangements set out how the GSA will identify its risk profile. Core to this is thorough risk assessment and completion of risk registers. The GSA is committed to developing and implementing proactive management arrangements to reflect the risk profile. These will include effective communication with all of our stake holders, training, developing positive attitudes and behaviours as well as suitable control systems and workplace precautions. In this way, risks to health and safety, as well as business continuity, can be identified and be either eliminated or controlled.

#### Check

Information produced by both active and reactive monitoring arrangements at all levels in the GSA directly supports the evaluation of the degree and effectiveness of the implementation of the GSA's



arrangements for controlling risk.

Information from active arrangements includes reports on regular safety inspections for premises and equipment, the results of health surveillance, the minutes of meetings of the Occupational Health and Safety Management Committee, reports on training needs, and significant findings of the GSA's risk assessments.

Information from reactive arrangements includes reports of accidents, damage to property or nearmisses, analysis of accident trends and reports on weaknesses in performance standards. Some or all of these will be chosen as key performance indicators to monitor the effectiveness of the plan.

#### Act

The GSA will review the performance of the system, both individual elements and as a whole, and determine its continuing suitability, adequacy and effectiveness.

The GSA systematically reviews performance following events such as incidents, accidents, ill-health, changes in activities or organisational structure, new or revised legislation, new or revised sector guidance, and occupational health and safety audits or inspections. This informs and sustains the continuous improvement of the GSA's Health and Safety Management System.

The GSA will ensure that lessons are learnt from accidents and incidents, ill-health data, errors and relevant experience, including from other organisations and passed through the management structure. Plans, policy documents and risk assessments will be revisited to see if they need updating.

Health and Safety is included in the GSA's internal audit cycle and may include appropriate external review.

#### 1.4. Structure

The Health and Safety Policy and the arrangements document are key components of the Health and Safety Management System, and represent the GSA's commitment to, and plan of action for, managing health and safety. The structure of the GSA's Health and Safety Management System documentation includes three inter-related levels:

Level 1 – The Occupational Health and Safety Policy and the Occupational Health and Safety Policy Arrangements documents provide an overarching description of the H&S management system including the leadership, responsibilities and organisation for implementing and communicating the Health and Safety Policy.

Level 2 – Detailed Occupational Health and Safety Arrangements, issued as individual, topic-specific documents, mainly in the form of policies, procedures, guidance and related documents e.g. Policies and guidance on general risk assessment, working at height, work equipment, events, lone working and offsite work etc developed and issued by the H&S team and made available on the H&S <u>student</u> and <u>staff</u> intranet pages.

Level 3 – Occupational Health and Safety Arrangements (inclusive of risk assessment, safe systems of work, and relevant standard operating procedures) developed and issued by individual academic Schools or professional support areas and reflective of their implementation of the GSA's Occupational Health and Safety Arrangements. These inform staff of relevant health and safety issues, together with the procedures and systems in place at academic or professional support area level to implement OHS Policy objectives.



#### 1.5 Aim and Scope

This document aims to assist Heads of Schools and Directors/Heads of Department in developing and implementing effective health and safety arrangements within their area of responsibility. It applies to all academic and professional support areas.

#### 2 Management of Health and Safety at the GSA

UK law and the GSA requires that all students, staff, and visitors, take reasonable care for their own health and safety, as well as that of those who may be affected by their acts or omissions. All students, staff, and visitors must co-operate with the GSA in the performance of its Health and Safe duties.

There are additional Health and Safety duties placed upon the different categories of persons within the GSA and this provides a framework for implementing effective occupational health and safety management arrangements.

#### 2.1 The Board of Governors

The overall responsibility for occupational health and safety at the GSA rests with the Board of Governors. The Board of Governors is responsible, so far as is reasonably practicable, for ensuring that an effective Health and Safety Management System is established and maintained to ensure compliance with legislation and best practice. Further, the Board of Governors is committed to the continuous enhancement of health and safety performance at the GSA. In achieving its aims, the Board of Governors will:

- Assure itself that there are appropriate management structures in place and designated roles
  created for achieving the strategic and operational delivery of health and safety at the GSA
  and the provision of a safe learning and working environment.
- Assure itself that the Health and Safety Policy is considered and implemented and will ensure that it is reviewed annually.
- Assure itself that the occupational health and safety risks associated with activities undertaken at the GSA are identified, assessed and managed effectively.
- Assure itself that consultation takes place with staff and recognised Trade Union representatives.
- Assure itself that the Occupational Health and Safety Policy and procedures at the GSA are monitored and reviewed and, when necessary, challenge reports on occupational health and safety and seek clarification or further information so that Governors can be satisfied that occupational health and safety is being managed effectively. This includes incidents, near misses and actions taken.
- Appoint Independent Governors as Convenor and Vice-Convenor of the Board-level Health and Safety Committee, and Trade Union Governors, Staff Governors, and Student Governors as members of that committee.
- Assure itself, via the Director, that a management-level Occupational Health and Safety
  Management Committee operates effectively and that reports are made by that committee
  to the Senior Leadership Group, with appropriate subsequent reporting made to the Board-



level Health and Safety Committee and the Board of Governors.

#### 2.2 The Director

The Director has responsibility, so far as is reasonably practicable, for all matters of occupational health and safety at the GSA and is accountable to the Board of Governors. In carrying out these duties the Director will:

- Demonstrate leadership and engagement by ensuring occupational health and safety matters form an important and integral part of the strategic aims of the School.
- Ensure occupational health and safety is included in role responsibilities at the GSA.
- Ensure resources are made available to allow the effective implementation of the Health and Safety Policy.
- Set objectives for the GSA's Senior Leadership Group and, through the line management structure, Heads of Department, in respect of occupational health and safety strategy.
- Monitor and review occupational health and safety progress at the GSA.
- Approve occupational health and safety related-policies and ensure that the aims and objectives of the GSA's Health and Safety Policy are communicated to the Board of Governors.

#### 2.3 The Senior Leadership Group

The Senior Leadership Group currently comprises the Director, Heads of School and appropriate senior officers. Heads of Department directly report to their respective Senior Leadership Group member.

Members of the Senior Leadership Group are accountable to the Director and the Board of Governors and ensure that the GSA's Occupational Health and Safety Policy is implemented, so far as is reasonably practicable, within their area of responsibility and control. The Director of Estates' remit encompasses the central occupational health and safety service, which delivers competent advice and guidance. The Director of Estates is accountable to the Director.

The Senior Leadership Group members' individual and collective duties include:

- Demonstrating personal leadership by defining arrangements and management structures for the local organisation of occupational health and safety matters and communicating these to all managers so that they in turn are aware of, and are able to fulfil, their responsibilities.
- Ensuring that the health and safety objectives set by the Director are carried out, performance standards are met, and effective monitoring and review takes place.
- Maintaining awareness of relevant legislation, standards and best practice.
- Assisting with accident investigations and taking remedial action, where appropriate.
- Delivering a safe working environment for students, staff, and visitors to the GSA.
- Approving policy in accordance with current the GSA arrangements and procedures.

Senior Leadership Group members have strategic duties for managing occupational health and safety



within their areas of responsibility. In discharging their duties, they will, so far as is reasonably practicable, ensure that there is a healthy and safe working environment for students, staff, visitors and others who may be affected by the conduct of the GSA's undertaking.

# 2.4 Heads of Schools, Directors/Heads of Academic and Professional Support Departments, Programme Leaders

Heads of School, Directors/Heads of Academic and Professional Support departments, Programmes Leaders and other line managers have duties for managing health and safety within their areas of responsibility. Within this exists varying line management structures. All parties must ensure, so far as is reasonably practicable, that health and safety standards are adhered to within their areas of responsibility and that students and staff are informed and kept updated regarding health and safety matters and good practice.

In discharging their duties all parties will, so far as is reasonably practicable:

- Ensure that there is a safe working environment for students and staff by implementing the
  health and safety aims of the Director and the Senior Leadership Group by complying with
  established the GSA policy, relevant legislation, formal arrangements, guidance, standards
  and best practice.
- Clearly define arrangements for the local management of health and safety matters, including establishing procedures and designating responsibilities, as appropriate.
- Monitor and review standards, at least annually, and more frequently as appropriate.
- Ensure that the GSA's Health and Safety Policy is effectively communicated to students and staff under their control, including all new students and members of staff.
- Ensure that necessary information, instruction, supervision and training is provided.
- Ensure that a programme of risk assessments relating to activities within their area of responsibility is in place and that the significant findings are communicated to relevant students and staff.
- Ensure that School and departmental Senior Management Teams retain health and safety as
  a standing item for each meeting and that one meeting per academic semester will be
  primarily focused on Health and Safety.
- Ensuring that arrangements are made for the local management of and, where appropriate, escalation of occupational health and safety issues.
- Implementing the GSA requirements for local monitoring and reviewing of compliance with established the GSA policy, relevant legislation and standards.
- Carrying out or assisting with investigations into accidents and dangerous occurrences, as appropriate.

#### 2.5 Director of Estates and Infrastructre.

The Director of Estates and Infrastructure is responsible for:

• the completion of suitable and sufficient risk assessment of the operation of the estate, which includes buildings, communal areas, teaching rooms, gardens or grounds, and all activities



- associated with the construction, maintenance and refurbishment of such areas through the Estates team.
- Being the line manager for the Head of Health and Safety and providing resources as reasonably required to ensure that the H&S Policy and arrangements can be implemented.
- Being the Chair of the Occupational Health and Safety Management Committee

#### 2.6 Head of Health and Safety

The Head of Health and Safety must:

- Maintain their competence to act as the Responsible Officer for Health and Safety within the GSA as required by the Health and Safety at Work etc Act 1974
- Lead on health and safety, ensuring that all aspects of legislative requirements are understood in order that the GSA may fulfil its statutory obligations and adherence to regulations, associated Codes of Practice and guidance (e.g. HSE).
- Lead on business continuity planning and incident management policy and protocol, ensuring that the GSA's central provision and support for local delivery are appropriate.
- Be the specialist adviser to the Senior Leadership Group on these matters and on related sector developments, including playing a key role in the GSA's business continuity planning team (SLG plus), and the major incident response team (Safe Campus Group), in the event of emergency situations. All as defined in the Business Continuity and Emergency Planning Policy and Procedures.
- Ensure the appropriate provision and review of central policy, guidance and support, training and engagement, monitoring, reporting, across all areas of activity, including relevant support for those leading on local activity.
- Develop and enhance an appropriate Health and Safety strategy, aligned with the GSA's
  Health and Safety Management System, designed and delivered to achieve continuous
  improvement in safety, compliance culture and practice.
- Prepare thorough and insightful updates, reports and plans for committees, the Senior Leadership Group, and the Board of Governors.
- Develop, enhance and promote a positive safety culture throughout the GSA, including
  designing and leading safety campaigns and initiatives supported by a suite of policies, plans,
  codes of practice and guidance which are reflective of legislative developments and
  recognised best practice.
- Encourage and support students and staff to maintain health, safety and fire safety standards.
- Report on positive change and areas for further development.

#### 2.7 All Staff

Staff are accountable to, and must co-operate with, their line managers in terms of occupational health and safety at the GSA. Staff must:

• Take reasonable care for their own health and safety and that of others who may be affected by their acts or omissions.

- Report any relevant health and safety incidents or concerns to their line manager.
- Ask questions and be proactive in the management of Health and Safety.
- Make health and safety management part of every activity that they carry out for the GSA.

#### 2.8 Students and visitors (includes contractors)

Health and safety is both a collective and individual responsibility for all persons working for or with the GSA. To this end students and visitors must :

- Adhere to the GSA's policies and procedures and co-operate with the GSA in occupational health and safety matters.
- Take reasonable care of their own health and safety but also that of others who may be affected by their acts or omissions.
- Report health and safety incidents or concerns to a staff member.
- Ask questions and be proactive in the management of health and safety.
- Make health and safety management part of every activity that they carry out for the GSA.

#### 3 Organising for effective management

#### 3.1 Understanding the GSA's Undertaking

Heads of Schools and Directors/Heads of Department are required to have an appreciation of the extent of their responsibilities for their academic and professional support areas, in terms of the space occupied, the facilities and services used and the nature of academic/work/research activities, whether on-campus or off-campus, in order to:

- Establish and maintain control of risks. Where necessary, they should ensure that their area
  of responsibility is divided into smaller areas or sections, for the purposes of managing health
  and safety.
- Those who undertake casual work, or are volunteers, should be covered by one of these areas, so that health and safety provision can be made for all concerned.

#### 3.2 Understanding the GSA's Risk Profile

Heads of Schools and Directors/Heads of Department are required to ensure that:

- A risk assessment programme is established covering their areas of responsibility. This
  programme will also inform the allocation of health and safety responsibilities and whether
  any specialist advice or training is required.
- The hazards associated with each area or section of their undertaking are identified under broad categories. For example, chemical hazards; electrical hazards; general fire hazards; fire or explosion hazards: Hazards from compressed gases; health hazards arising from the



production of dusts or fumes; mechanical hazards from work equipment; office hazards from trailing cables or layout of furniture; work at height.

- The Hazards are removed or controlled and the residual risk assessed.
- Maintain a register of the identified risks.

#### 3.3 Allocating Health and Safety Functions

Each academic and professional support area needs an effective management structure for delivering the Health and Safety Policy aims and objectives and implementing arrangements. This can be enhanced by pooling the knowledge and experience within it and promoting co-operation between individuals and groups.

Heads of Schools and Directors/Heads of Department should:

- Ensure that any key health and safety functions are allocated to line-managers, individuals or groups, based on their job descriptions, areas or sections under their control, or risk profile of the area concerned.
- All duties and functions should be clearly defined and documented.
- Individuals should be given the appropriate level of authority to carry out their health and safety duties and functions, bearing in mind that while authority may be delegated, responsibility cannot.

#### 3.4 Competence and Supervision

#### 3.4.1 Staff

Each academic and professional support area needs to make sure that staff are suitably trained, experienced, knowledgeable, and where necessary, supervised, in order to protect their health and safety.

Heads of Schools and Directors/Heads of Department should:

- Implement a health and safety induction programme so that that new personnel receive, appropriate awareness training. Where necessary, this programme should include a schedule of competency training, based on work activities and responsibilities.
- Those with specific health and safety roles should also receive training focusing on both awareness and competency requirements, commensurate with their duties and functions and based on an analysis of needs.
- Line managers in academic and professional support areas should provide adequate supervision commensurate with the competency of the individuals under their control and risk profile of the activity.
- Health and safety development needs and/or training should be discussed during regular meetings with staff and at career reviews.
- All records associated with health and safety training should be retained in accordance with the General Data Protection Regulations, the GSA's Records Management Policy, and any



specific health and safety statutory requirements.

#### 3.4.2 Undergraduate and Postgraduate students

The GSA has a duty to ensure the health and safety of its students, which includes the provision of adequate information, instruction, training and supervision whilst undertaking coursework, study and research. This covers a wide range of activities including offsite work, practical classes, project work, use of studios and workshops, and activities outside normal hours including lone work.

It is the responsibility of each Head of School and Directors/Heads of Department to:

- Make adequate arrangements for the provision of appropriate health and safety induction to students.
- Provide suitable and sufficient levels of supervision for the students under their control, which is proportionate to their levels of competence and the risk profile of the activities they are conducting.
- Make sure that health and safety information, instruction, training and supervision of students is adequate and based on a suitable and sufficient risk assessment before it proceeds.
- Make sure that Programme Leaders, tutors, line-managers, and supervisors, have a clear understanding of their responsibilities and are actively discharging them.

#### 3.5 Communication

Heads of Schools and Directors/Heads of Department should develop procedures for effectively communicating information concerning the GSA's H&S Policy, departmental roles and responsibilities, including arrangements and revisions of them to those involved or affected. This can be achieved in a number of ways, for example, through departmental, programme, section or team briefings, standing agenda items, emails and newsletters, management reports, notice boards, health and safety inductions, safe systems of work, and dissemination of findings of risk assessments and health and safety inspection or investigation reports.

#### 4 Planning and implementing arrangements

#### 4.1 Implementing the GSA-wide arrangements

As an employer, the GSA's undertaking is subject to statutory health and safety duties, which drive health and safety arrangements for managing risks associated with the GSA work activities, hazards and other issues.

These arrangements represent Level 2 of the GSA's OHS Policy documentation, principally Policies, Procedures, guidance and associated supporting documents relating to specific tasks such as offsite work and study, Lone work and study, Working at Height, work equipment, events etc.

These are available on the student and staff Health and Safety Intranet pages.

This element of the OHS Policy sets out the standards of management required by the GSA that, if adhered to, can demonstrate compliance with legal duties and/or good practice.

They normally include roles and responsibilities of various individuals and groups, along with practical advice on managing the associated risks.

The procedural and guidance documentation represents the standards against which academic and



professional support areas will be monitored and audited.

This documentation will usually relate to specific legislation or subject matter and, depending on the subject matter, is approved by the Senior Leadership Group, and / or the GSA Occupational Health and Safety Management Committee.

Heads of Schools and Directors/Heads of Department should therefore make any necessary provision to integrate these management standards into their area of responsibility.

#### 4.2 Developing a Programme of Risk Assessments and Safe Systems of Work

Health and safety legislation and the GSA H&S Policy requires the GSA and, consequently, its academic and professional support areas to complete suitable and sufficient assessments of the risks to the health and safety of employees to which they are exposed whilst at work or study, and of the risks to other persons, including students, arising out of, or in connection with, its undertaking.

The purpose of risk assessment is to identify and evaluate hazards, determine if adequate controls, including removal of the hazard, have been implemented to prevent harm to people, property or the environment, or if improvements to controls are needed.

It is also a legal requirement to provide safe systems of work to help ensure the health and safety of employees and others whilst at work.

The GSA-wide and any academic and professional support area arrangements (Level 3) contribute to compliance with this duty, since they will set out relevant preventive and protective measures.

Very specific work and research activities are unlikely to be covered by general arrangements, so separate arrangements will need to be made. These may be in the form of recorded significant findings of risk assessments (for lower risk activities), or safe systems of work (for higher risk activities) developed from the significant findings of relevant risk assessments.

Heads of Schools and Directors/Heads of Department must ensure that an adequate programme of risk assessment and, where necessary, safe systems of work is implemented to cover the full range of specific work and research activities. This may require that sufficient staff members are trained in risk assessment techniques and that the process is integrated into their normal work. Those affected need to be provided with comprehensible and relevant information on the risks to their health and safety, and the preventive and protective measures in place or precautions required.

The process that ensures the programme of risk assessments and/or the associated safe systems of work is implemented is an important part of the documentation that supports the academic and professional support area arrangements.

Suitable formats for risk assessment of various activities are available on the staff Health and Safety Intranet pages and student Health and Safety Intranet pages.

Training and advice can be sought from the Health and safety Team.

#### 5 Measuring performance

The primary purpose of measuring health and safety performance is for the GSA and its academic and professional support area management teams to judge the implementation and effectiveness of the arrangements for controlling risk.

Measurement information can be used to identify areas where corrective action is necessary and to



determine how well a positive health and safety culture is being developed among staff and students, all with a view to continual improvement. Various means of monitoring can be employed as outlined below:

#### 5.1 Health and Safety Inspections

The GSA's Active Monitoring Inspection Programme is delivered by the Health and Safety Team in accordance with the current GSA Health and Safety Plan. To complement this, Heads of Schools and Directors/Heads of Department should ensure that, within their area of responsibility, academic or professional support departments have made arrangements for regular inspections of areas and work activities.

#### 5.2 Reports of Accidents, Incidents and Near Miss events

The findings of investigations into the causes of accidents, incidents and near miss events (Re-active Monitoring), within academic and professional support areas, are important. They provide useful information on health and safety management arrangements that may have failed, along with recommendations to improve future performance. It is advised that Heads of Schools and Directors/Heads of Department ensure they are kept informed of all incidents, they monitor the progress of necessary actions to prevent a similar incident and that relevant information is communicated to those who could be affected.

#### **5.3** Key performance Indicators

The Head of health and safety will report to the Director of Estates and the Occupational Health and Safety Management Committee (OHSMC) on data provided by leading and lagging performance indicators which may include some or all of the above. Please refer to the level 2 Policy and guidance on KPIs.

#### 6 Reviewing performance

Reviewing is the process of using performance findings to make judgments about the adequacy of the GSA's Occupational Health and Safety Management System at all levels, including academic and professional support area, department or even more specific level, and to take decisions about the nature and timing of actions to remedy deficiencies.

Heads of Schools and Directors/Heads of Department are, therefore, required to:

- Develop an Occupational Health and Safety Action Plan (OHSAP) to present, prioritise and track the medium to longer term health and safety objectives of the academic and professional support area, with a view to continuously improving the Health and Safety Management System and using resources efficiently.
- The OHSAP may include risk-reducing actions identified by risk assessments or health and safety inspections, or items highlighted from the GSA Annual Health and Safety Report, which require significant planning, lead-time and financial resources.

#### 7. References

Managing for health and safety (HSG65) https://www.hse.gov.uk/pubns/books/hsg65.htm Health and Safety at Work etc Act 1974 https://www.hse.gov.uk/legislation/hswa.htm HSE tool box How to manage Health and Safety

https://www.hse.gov.uk/toolbox/managing/index.htm