

The Highland Council

Resources Committee – 27 May 2015

Agenda Item	25
Report No	RES/52/15

Health and Safety Management System Update

Report by Depute Chief Executive/Director of Corporate Development

Summary

This paper presents an update to the Council's health and safety management system, namely the annual review of the Corporate Health, Safety and Wellbeing Policy, and the updated Radon Policy. It also introduces a proposed timetable for the ongoing review of the health and safety management system.

1. Background

- 1.1 The health and safety management system is the collective name given to the suite of health and safety policies, procedures and guidance which assist managers continue in compliance with health and safety legislation.
- 1.2 As part of the commitment to ensure the health and safety management system is up to date and reflects current legislation and best practice, a proposed timetable for the ongoing review of the health and safety management system is also included.
- 1.3 Consultation with Services and Trade Union reps has taken place. The policies were on the Central Safety Committee agendas of 6 February 2015 and 15 May 2015.

2. Corporate Health, Safety and Wellbeing Policy 2015

- 2.1 The Health and Safety at Work, etc. Act 1974 places a requirement on organisations employing 5 or more staff to have in place a written health and safety policy which is regularly reviewed and signed by the Chief Executive. The Council's policy was last reviewed in 2014 following the Council's restructure.
- 2.2 The policy has been updated to ensure it reflects the current structure and consultation mechanisms (such as the Partnership Forum) and additional information required as a result of the recent Improvement Notice (see 2.6).
- 2.3 Information on the Plan-Do-Check-Act approach to managing health and safety has been included (section 5.3.4) which gives senior managers more information and advice on proactive planning of health and safety issues, including a number of actions to be addressed. Service health and safety plans

should be included in Service annual health and safety reports to Central Safety Committee.

- 2.4 Additional policy statements and hyperlinks to guidance have been included for, the management of hand arm vibration syndrome, radon, work equipment, positive purchasing and a number of property-related safety issues.
- 2.5 A flowchart reflecting formal health and safety communication and consultation channels has been included as an Appendix in the policy.
- 2.6 The Council was served with two Improvement Notices and a Management Letter with regard to the management of hand arm vibration work. If work with vibrating tools is not adequately managed it can lead to irreversible damage to the nerves and tendons in the hand. The actions to lift the notice are around:
- Risk assessment
 - Information, instruction and training
 - Supervision
 - Equipment control - including specifications, inventory, maintenance
 - “Positive” purchasing of tools and equipment (i.e. ensuring that equipment hired/purchased is assessed for noise, vibration and ergonomics)
 - Health and Safety auditing – an audit of the health and safety management arrangements in each Service will be conducted by the Occupational Health Safety and Wellbeing Manager over the next 12 months.
 - Review of the health and safety management system (policies and procedures)
 - Workplace inspections at depots.
- 2.7 Although the Notices were served on Community Services, work in Development and Infrastructure and Care and Learning will need to be assessed to ensure it is done to the same standard as that put in place for Community Services.

3. Managing Radon in the Workplace

- 3.1 This policy has been updated to reflect changes in the Council structure, subsequent responsibilities and updated knowledge acquired as a result of the work undertaken in the high probability areas.
- 3.2 Public Health England, the main advisory body for radon, have recently set a domestic Target Level of 100 Bq/m^{-3} which is the ideal outcome for remediation works in existing buildings and protective measures in new buildings.
- 3.3 Phase 1 of the workplace radon monitoring exercise has been completed. Some additional works were required where radon readings were high and remedial measures put in place. This work has now been completed and the

premises subjected to long term monitoring.

- 3.3 Phase 2a of the project – involving schools and residential homes where there is 1-3% probability of the presence of radon – is well underway. Three schools were found to have radon readings above the action level and remedial work is underway.
- 3.4 Phase 2b will involve other workplaces in the 1-3% probability band. Identified workplaces will have 3 month monitoring in place in 2015. Phase 3 will look at premises in close proximity to higher bands or to workplaces where radon is above the action level.
- 3.5 Remedial works are underway in domestic premises identified to be above the action level.

4 Awareness raising/communication of changes

- 4.1 Managers and staff will be made aware of the changes to these policies via
- Corporate/Service newsletters
 - Service/Area health and safety meetings
 - Email and Intranet
 - Relevant training workshops.

5. Health and safety management system review

- 5.1 As with the health and safety policy it is best practice to regularly review these documents to ensure they remain up to date and reflect any legislative changes or changes in best practice.
- 5.2 All policies, procedures and guidance are presented to the Central Safety Committee for consultation with Trade Unions. Policies are presented to Resources Committee for approval following this consultation.
- 5.3 The proposed timetable identifies when each document is to be reviewed and when they are presented to Committee.

6. Implications

- 6.1 Failure to follow health and safety legislation can lead to enforcement action by the Health and Safety Executive (HSE) which can range from the serving of an Improvement Notice to Court Proceedings. HSE intervention is now charged at a cost of £124 per hour.
- 6.2 There are no other Resource, Legal, Equalities, Climate Change/Carbon Clever, Risk or Rural implications arising from this report.

7. Recommendations

7.1 It is recommended that Resources Committee:

- I. Approves the revised Corporate Health Safety and Wellbeing Policy and the Policy on Managing Radon in the Workplace
- II. Approves the proposed timetable for review of the health and safety management system

Signature:

Designation: Depute Chief Executive/Director of Corporate Development

Date: 13 May 2015

Author: Gena Falconer, Occupational Health, Safety and Wellbeing Manager

Occupational Health, Safety and Wellbeing Policy

Version 3 - May 2015

1. **Policy statement - health, safety and wellbeing**
- 1.1 It is the policy of The Highland Council to take all reasonably practicable steps to ensure the health and safety at work of all its employees and others who may be affected by its undertakings. In addition, it is committed to ensuring that all reasonable measures are in place to maintain and enhance staff wellbeing so that staff can lead productive and healthy working lives.
- 1.2 The Council accepts the aims and provisions of the Health and Safety at Work etc. Act 1974 (as amended) and also aims to comply with all other health and safety statutory obligations. A high standard of health and safety performance is one of the Council's primary objectives and is recognised as an integral part of service delivery.
- 1.3 This standard will be achieved by:
 - a) Creating and maintaining a positive health and safety culture which secures the commitment and participation of employees;
 - b) Meeting its responsibilities to employees, to other people and the environment in a way which recognises that legal requirements are the minimum standard;
 - c) Adopting a planned and systematic approach to implementation of this policy, to ensure:
 - i) The provision and maintenance of plant and systems of work that are, so far as is reasonably practicable, safe and without risks to health;
 - ii) Arrangements for ensuring, so far as is reasonably practicable, safety and absence of risks to health in connection with the use, handling, storage and transport of articles and substances;
 - iii) The provision of such information, instruction, training and supervision is necessary to ensure, as far as is reasonably practicable, the health and safety at work of employees;
 - iv) So far as is reasonably practicable, as regards any place of work under the Council's control, the maintenance of it in a

condition that is safe and without risks to health, and the provision and maintenance of means of access to and egress from it that are safe and without such risks;

- v) The provision and maintenance of a working environment for employees that is, so far as is reasonably practicable, safe and without risks to health, and adequate as regards facilities and arrangements for their welfare at work;
- d) Identifying and assessing the risks associated with all activities of the Council, with the aim of eliminating or controlling these risks, so far as is reasonably practicable. In this respect, particular attention will be paid to the protection of young persons and to new or expectant mothers;
- e) Allocating resources to meet the requirements of this policy;
- f) Establishing a health and safety management system, in accordance with the Health and Safety Executive's guidance 'Successful Health and Safety Management Systems' (HSG65), including planning for health and safety, the setting of realistic short and long term objectives, deciding priorities and establishing adequate performance standards
- g) Monitoring and reviewing performance on a regular basis to ensure that high standards are maintained
- h) Fostering positive working relationships with employee representatives, encouraging full consultation on health and safety matters at all levels and requiring health and safety to be a standing item on all relevant management and staff meeting agendas
- i) Maintaining arrangements for co-ordination and co-operation with other employees where Council employees or clients share premises, facilities or activities with persons working in other organisations
- j) Ensuring the demands of work activities do not exceed the capability of employees to carry out the work without risk to themselves.

1.4 As a major employer, the Council will seek to influence the health and safety performance of its contractors through the appointment and subsequent service delivery process. Health and safety issues will be taken into account during the procurement of all services, vehicles, plant, equipment and supplies.

1.5 The Council assumes responsibility for ensuring so far as is reasonably practicable that working conditions at all workplaces are free from avoidable risks to the health, safety and wellbeing of employees.

1.6 The Council is committed to the provision of access to competent occupational health services, providing health surveillance and to the promotion of physical and mental good health and wellbeing.

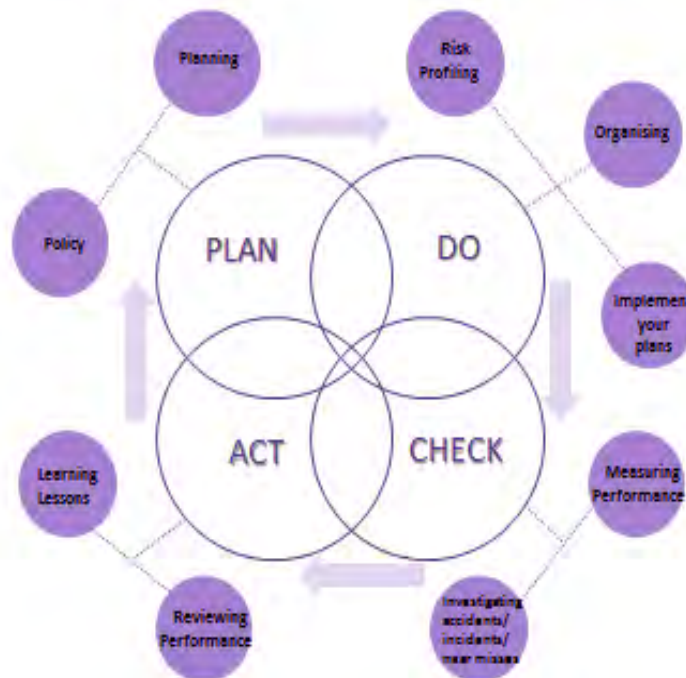
1.7

A copy of this policy statement will be issued to all employees at its adoption and to all new staff at their induction. Managers should retain signed records to show that the policy has been received. An up to date copy of this policy will be available on the Council's Intranet

1.8

The key elements of the OHSW management system are:

- **Plan** – corporate/Service polices and plans in place
- **Do** – Service risk profiles, Service arrangements for health and safety, plan implemented
- **Check** – Measuring performance (proactive and reactive)
- **Act** – Review performance, act on lessons learnt



1.9

Occupational health, safety and wellbeing responsibilities are set out in this policy and the alignment between responsibilities and Plan-Do-Check-Act are illustrated in the diagram below.



Steve Baron
Chief Executive

Date

2.

Health, Safety and Wellbeing – Organisational Responsibilities

2.1

Chief Executive

The Chief Executive is responsible, so far as is reasonably practicable, for ensuring the health and safety at work of all Council employees. He is accountable to The Highland Council for ensuring compliance with The Health and Safety at Work, etc. Act 1974 and all other subordinate legislation. This will be achieved by:

- a) Detailing the organisation in the Council through which this policy will be implemented,
- b) Ensuring that adequate resources are made available to enable this policy to be implemented,
- c) Ensuring that health and safety is an integral part of the overall management culture and developing a positive attitude to health, safety and wellbeing among employees by visibly demonstrating commitment to achieving a high standard of performance with regard to health, safety and wellbeing,
- d) Ensuring that health and safety is a regular agenda item at senior management meetings,
- e) Appointing a competent person to assist the Council to apply the provisions of health and safety legislation,
- f) Ensuring that health, safety and wellbeing objectives are

- defined annually and that success in meeting these objectives are formally measured and reported,
- g) Ensuring that Elected Members are kept informed of health and safety issues as appropriate,

Whilst the Chief Executive retains responsibility for the matters set out above, practical responsibility is delegated to Service Directors and line managers in respect of the areas under their control.

2.2 Service Directors are responsible, so far as is reasonably practicable, for:

- a) The implementation and monitoring of this policy within their own service, and ensuring good communication with employees at all levels
- b) Ensuring that sufficient resources are available to ensure compliance with all health and safety requirements
- c) Developing and maintaining a health, safety and wellbeing policy which is specific to the tasks and responsibilities of their service. This must detail the service health and safety management system, which will include arrangements for assessing, planning, organising, monitoring and reviewing the measures required to eliminate, reduce or control local risks.
- d) Establishing arrangements for health and safety consultation within their service
- e) Bringing to the attention of line management that health and safety responsibility is shared and that they will be accountable for the health and safety of employees, or others who may be affected by the work of the Service
- f) Submitting a service annual health and safety report to the appropriate Council Committee (see 3.3.2).

2.3 [Depute Director/Director of Corporate Development](#) has been nominated as the member of the Council's Senior Management team with specific responsibility for health and safety issues including the production of an annual report detailing the Council's health and safety performance.

2.4 Director of [Development and Infrastructure](#) is responsible for establishing a Corporate Safety Management System to monitor and ensure that property related statutory inspections are carried out in respect of all Council occupied premises.

2.5 [Corporate Leadership Support](#) is responsible for ensuring the implementation, and subsequent monitoring of corporate and service health, safety and wellbeing policies within the Council's Administrative areas. In particular, they should:

- a) Ensure that health and safety remains a regular item on management team meeting agendas
- b) Ensuring that health and safety issues in multi-service occupied buildings are adequately addressed and co-ordinated
- c) Establish Area health and safety groups to ensure effective consultation and communication with all staff in their operational

areas.

2.6

Heads of Service/Area Managers/Team Managers/Head Teachers

2.6.1

Heads of Service, are responsible for:

- a) Ensuring that sufficient numbers of trained risk assessors are available in the Service
- b) Ensuring that appropriate, valid risk assessments are available, and regularly reviewed, for activities conducted by the service
- c) Ensuring proper control, including monitoring, of contractor activities
- d) Nominating a responsible person in each premises for dealing with health and safety property matters. Where premises are shared, the relevant Heads of Service should ensure that one RPO is appointed and that pertinent information is shared. RPO training is available from [Learning and Development](#).

2.6.2

Heads of Service, Team Managers, Area Managers and Head Teachers are responsible for:

- a) Implementing this policy in their area of responsibility
- b) Ensuring compliance with all legal requirements and relevant Council health, safety and wellbeing documents
- c) Ensuring that new employees receive a health and safety induction which must include an awareness of all precautions and procedures applicable to the job activity, and any emergency procedures
- d) Ensuring that any health and safety responsibilities delegated to staff are advised of the pertinent findings of risk assessments and any changes to work practices
- e) Ensuring that all staff are, and remain, competent to carry out any activities as part of their duties and responsibilities, and
- f) Motivating and empowering employees to work in a safe and healthy manner in order to encourage a positive attitude to health, safety and wellbeing in the workplace
- g) Updating the Corporate health and safety manual.

2.7

Occupational Health, Safety and Wellbeing Manager is responsible for:

- a) Directing and assisting the Chief Executive, members of the Senior Management Team and other managers on health, safety and wellbeing matters;
- b) Acting as the Council's competent person in health and safety as required by legislation;
- c) Providing up to date information and advice on changes in legislation;
- d) Ensuring that health and safety performance is monitored;
- e) Development of a health, safety and wellbeing strategy;
- f) Ensuring, through a process of monitoring, inspection and auditing, that health and safety policies and guidance are being consistently applied across the Council;
- g) Manage the occupational health service;
- h) Monitoring compliance with this policy

2.8

Employees

Each employee is responsible for their own acts or omissions and the effect that these may have upon the safety of themselves or anyone else. Whilst the Council accepts the main responsibility for the implementation of this policy, individuals are legally obliged to co-operate to ensure a healthy and safe working environment.

In addition all employees must:

- a) Avoid taking unnecessary risks;
- b) Set a good example to others, especially young or inexperienced workers;
- c) Work in accordance with any health and safety instruction or training that has been given;
- d) Bring to the attention of a responsible person any health and safety issues they may have; and
- e) Familiarise themselves with this Policy and any local arrangements.

The normal reporting line for health and safety matters is via line management. However, given that staff may work at a number of sites and that their line manager may be in another area, there is a need to ensure that health and safety matters can be, and are, referred to the appropriate Head of Service.

2.9

Safety Representatives

Through its health and safety partnership agreement with the recognised Trade Unions, the Council encourages the development of an effective network of trained safety representatives.

The appointment of safety representatives is the prerogative of accredited trade unions in accordance with the Safety Representatives and Safety Committees Regulations 1977(as amended) and the Health and Safety (Consultation with Employees) Regulations 1996.

The Council will ensure that recognised safety representatives are consulted and provided with reasonable facilities and time off to fulfil their duties.

In keeping with this policy, the Chief Executive regards the promotion of health and safety measures as an objective shared by management and employees at all levels and seeks to achieve this by consultation with all staff. This will be carried out corporately through the normal consultation channels – the Partnership Forum, the Local Negotiating Committee for Teachers and the Central Safety Committee - and locally by each local health and safety groups.

Trade union safety representatives will be encouraged to undertake the full range of their statutory duties in accordance with the terms of the established Safety Representatives Charter

2.10

Elected Members

All Elected Members should be aware of and accept their individual and collective responsibilities in the care of health and safety of themselves and others.

The Council will appoint an Elected Member as Health and Safety Champion with the specific remit of promoting health and safety in line with this policy.

Elected Members will take strategic responsibility for setting the health and safety direction and policy for the Council and will ensure effective strategic health and safety governance

2.11

Resources Committee

The Resources Committee is the vehicle responsible for formulating health and safety policy, monitoring its implementation and ensuring that sufficient resources are allocated to ensure that the Council meets its statutory health and safety obligations.

2.13

Central Safety Committee

The Central Safety Committee has been established as a subcommittee of the Resources Committee. It will ensure that formal consultation on health, safety and wellbeing issues takes place and provides a vehicle for joint participation in health and safety matters to enable Elected Members, management and employees to exchange views and to reach a better understanding on all matters and procedures related to health and safety. The Central Safety Committee will appoint a Chair and Vice Chair from the Elected Members and Trade Union representatives who are members of the Committee.

3.

General Arrangements

- 3.1 This document is the over arching policy for health and safety management within the Council. It will be supplemented by other guidance and procedures on specific issues such as risk assessment, accident reporting, manual handling etc. which will be available on the Council's Intranet and in the Council's health and safety manual.
- 3.2 The following requirements must be incorporated into Service health and safety arrangements as necessary. They should be expanded or altered to meet the specific requirements of the Service concerned and developed with the support of the health and safety team.
- 3.3 Specific reference to health and safety arrangements for new employees will be made during the induction process.
- 3.4 A copy of this policy will be given to every employee (see 1.7).

4

Safety Culture

- 4.1 A positive safety culture helps to ensure not only a low accident/incident rate but improves employee engagement and co-operation. The following elements will contribute to the Council's safety culture.
- 4.2 **Communication**
The Council recognise that employees have an important contribution to make to the overall organisational health and safety culture. The Council will ensure that health and safety is an integral part of its management system and seeks to develop a positive attitude to health and safety among employees by:
- a. Visibly demonstrating a clear commitment to improving health and safety performance;
 - b. Promoting co-operation and consultation across Services;
 - c. Ensuring the communication of necessary information throughout the Council; and
 - d. Securing the competence of employees by including health and safety within the recruitment process and systematically identifying health and safety training needs.
- 4.2.1 A flow chart showing the main formal communication channels is attached in Appendix 1.
- 4.3 **Health and Safety Advice**
The health and safety team will actively monitor the implementation of this policy and provide advice on action necessary to ensure the health and safety of Council employees and anyone who may be affected by the Council's undertakings.

4.4

Health and Safety Training

Health and safety training is an important factor in the reduction of accidents and prevention of ill health. Services will actively support training by providing the necessary resources and organisation to carry out such training. All new employees will receive a Service health and safety induction.

Where health and safety training needs are identified by Services, suitable training can be arranged through the Learning and Development team.

4.5

Safety Representatives

Safety representatives appointed by recognised Trade Unions are entitled to inspect work places every three months and if necessary more frequently. These inspections will be accompanied by an appropriate management representative.

Safety representatives appointed by recognised Trade Unions will be allowed to inspect any statutory document which the Service is required to maintain and will also be given, on request, information necessary to carry out their functions as defined under the Safety Representatives and Safety Committees Regulations 1977 and representatives of employee safety in accordance with the Health and Safety (Consultation with Employees) Regulations 1996.

Safety representatives should attend relevant health and safety groups

Services will consult the relevant safety representatives in accordance with the current Council policy.

4.6

Leadership

A positive safety culture must be led by management. Managers can work towards this by:

- a) Maintaining attention on the significant risks and implementation of adequate controls.
- b) Demonstrating their own positive health and safety behaviours
- c) Encouraging employees to raise concerns/discuss health and safety issues
- d) Making regular visits to workplaces under their control
- e) Addressing behaviours that create unacceptable risks.

4.7

Raising Health and Safety Concerns

Should an employee require to raise a health and safety concern, the procedure detailed below should be followed in line with local procedures:

STAGE 1. Raise concern with Supervisor. If not resolved:

STAGE 2. Raise concern with Manager. If not resolved:

STAGE 3. Raise the concern with Safety Representative. If not resolved:

STAGE 4. Safety Representative can raise concerns at the relevant health and safety management groups. If the matter is not resolved after three meetings:

STAGE 5. Matter is referred to the Central Safety Committee.

At any stage during this process, the employee may ask their union's safety representative to act on their behalf. The employee/safety representative can contact the health and safety team for further guidance at any stage.

4.8

[Liaison with the Health and Safety Executive \(HSE\)](#)

The Health, Safety and Wellbeing Manager will be the main point of contact between the Council and the HSE. Where the HSE makes direct contact with the Council the agreed [Management Protocol](#) should be followed.

5

Planning and Implementation

5.1

[Corporate Health and Safety Plan](#)

The Chief Executive will ensure, through the Head of People and Performance that a corporate health and safety plan is in place which will achieve and support effective health and safety management systems across the Council.

5.1.1

Services will also prepare a health and safety plan outlining specific Service health and safety objectives with realistic timescales for their accomplishment. These objectives will be developed in consultation with the health and safety team and recognised trade unions.

5.1.2

All health and safety plans must be regularly monitored by the Services' senior management teams at Health and Safety Planning groups (see 5.3). Updated health and safety plans must form part of the Services' annual health and safety report.

5.2

[Health and Safety Annual Reports](#)

Services will prepare annual health and safety reports that evaluate their health and safety performance. Such reports should include information on the following issues:

- a. Profile of the Service and its main functions and activities;
- b. Management of health and safety within the Service. This should include a report detailing the progress of the health and safety plan objectives from the previous year;
- c. Occupational health and safety risk management, planning and progress;
- d. Information on accident and incidents, including trends and lessons learnt;
- e. Health and safety training;
- f. Service health and safety objectives for the coming year.

5.3

Health and Safety Planning Groups

5.3.1

Each Director and nominated Head of Service are required to establish a Service health and safety planning group to assist in the formulation and implementation of their health and safety policy and plan. Planning for health and safety is suitable for inclusion as a standing agenda item within the remit of the Directorate senior management team meetings.

5.3.2

The planning group should identify and prioritise actions, and agree key performance indicators including achievable targets for implementation of the various elements of the health and safety plan. The group should also monitor implementation of the health and safety plan.

5.3.3

The operational planning group is not an alternative or substitute for local liaison meetings, safety groups or health and safety committees involving employee representation.

5.3.4

In terms of the Plan-Do-Check-Act model, Service Senior Management Teams shall ensure, as part of their planning for health and safety, that the following actions are taken.

Plan

- ✓ Think about where you are now and where you need to be.
- ✓ Say what you want to achieve, who will be responsible for what, how you will achieve your aims, and how you will measure your success. You should write down this policy and your plan to deliver it.
- ✓ Decide how you will measure performance. Think about ways to do this that go beyond looking at accident figures; look for active indicators as well as reactive indicators.
- ✓ Consider fire and other emergencies. Co-operate with anyone who shares your workplace and co-ordinate plans with them.
- ✓ Remember to plan for changes and identify any specific legal requirements that apply to you.

Do

- ✓ **Identify your Service risk profile.** Assess the risks, identify what could cause harm in the workplace, who it could harm and how, and what you will do to manage the risk.
- ✓ Decide what the priorities are and identify the biggest risks.
- ✓ **Organise your activities to deliver your plan**
In particular, aim to:
 - Involve workers and communicate, so that everyone is clear on what is needed and can discuss issues – develop positive attitudes and behaviours.
 - Provide adequate resources, including competent advice where needed.
- ✓ **Implement your plan** Decide on the preventive and protective measures needed and put them in place.
- ✓ Provide the right tools and equipment to do the job and keep them maintained.
- ✓ Train and instruct, to ensure everyone is competent to carry out

their work.

- ✓ Supervise to make sure that arrangements are followed.

Check

- ✓ **Measure your performance** Make sure that your plan has been implemented – ‘paperwork’ on its own is not a good performance measure.
- ✓ Assess how well the risks are being controlled and if you are achieving your aims. In some circumstances formal audits may be useful.
- ✓ **Investigate the causes of accidents, incidents or near misses**

Act

- ✓ **Review your performance** Learn from accidents and incidents, ill-health data, errors and relevant experience, including from other organisations.
- ✓ Revisit plans, policy documents and risk assessments to see if they need updating.
- ✓ **Take action on lessons learned, including from audit and inspection reports**

5.4

Service Health and Safety Co-ordinator

Each Service will appoint a Head of Service to act as Health and Safety Co-ordinator for the Service. The Co-ordinator will co-ordinate health, safety and wellbeing issues within the Service; chair the Service Health and Safety group and champion health, safety and wellbeing issues within the Service.

5.4

Risk Identification

The Council recognises that Services are required to implement an effective risk control strategy to minimise employees’ exposure to significant risks. Services must identify all significant local risks and ensure that these, and their associated controls, are communicated to staff.

For further information on risk assessments contact the health and safety team.

5.5

Accident and Incident Analysis

Every accident and incident will be investigated by the injured person’s supervisor or line manager. The completed report should be submitted to the Manager in the first instance. All accident forms completed must contain recommendations to prevent a recurrence.

Accidents and incidents resulting in:

- Major injury/dangerous occurrence
- Lost time accidents of 7 days or more
- Work related ill health and disease

will be analysed by Services’ management, the health, safety and wellbeing team, and health and safety groups with a view to determining and where possible, eliminating the causes, of such events.

5.6

Proactive monitoring

At least six monthly workplace safety inspections, inline with the Monitoring Protocol, shall be undertaken within all Services as part of their health and safety plan. This should be undertaken in conjunction with TU Health and Safety Representatives where possible,

In addition, occupational health and safety advisers will undertake compliance monitoring and physical verification exercises on a regular basis.

5.7

Premises managed by 3rd Parties

Services who occupy premises not managed by the Council should satisfy themselves that the management of the property meets standards/arrangements as described in Health and Safety/Property Management Policies and Guidance.

6.

Health, Safety and Wellbeing Guidance

6.1

Below are descriptions of the Highland Council's main health and safety guidance which address the main health and safety risks to the Council. These guidance documents require the full co-operation of Service management and staff at every level. Specific procedures, guidance and information will be developed to assist managers applying these policies appropriately.

6.2

Asbestos

The Highland Council recognises the health risks associated with breathing in air contaminated with asbestos dust/fibers. Arrangements will be made therefore to ensure, so far as is reasonably practicable, that employees and others (clients, contractors, pupils and public) who use or work in Highland Council premises are not at risk from exposure to hazardous forms of asbestos. Exposure will be minimised through the use of proper control measures and work methods supported by training of employees as detailed in the Guidance on Managing Asbestos document.

Asbestos surveys will be completed in all public buildings and Asbestos Management Plans (AMP) prepared. RPOs will be expected to manage and update the AMP as required.

No work shall commence on asbestos material or materials thought to contain asbestos until it is sampled and an assessment of the potential exposure of employees and others, as a result of that work, is undertaken. A suitable plan of work shall be made before the work commences

6.3

Consultation

The arrangements for consultation with employees on health and safety matters are:

a) Central Safety Committee

As a sub-committee of the Councils Resources Committee's

Partnership Forum, the Central Safety Committee provides a forum for formal consultation with the recognised Trade Unions on health and safety issues.

b) Area Health and Safety Groups

Health and Safety groups have been established in the Council's main administrative centres. These groups ensure that consultation with all staff (Union and non-Union) takes place at a local level in the Areas.

c) Service Health and Safety Groups

Each Service is required to establish a consultation group to ensure that Service specific health and safety issues are discussed with staff involved in all aspects of Service delivery.

d) Management and Staff Meetings

Health and safety should be included as a regular item on the agenda of all Management and Staff meetings. This will ensure that staff at all levels are given the opportunity to raise health and safety concerns and participate in the overall consultation process.

6.4

[Control of Substances Hazardous to Health](#)

Directors shall have arrangements in place to ensure that no work is carried out which is liable to expose any employees or others to any product, chemical or substance hazardous to health unless a suitable and sufficient assessment of the risks created by that activity and of the steps needed to reduce the risks has been made.

Exposure to hazardous products, chemicals or substances will either be prevented or, where this is not reasonably practicable, adequately controlled. Measures introduced to control exposure will be maintained, examined and tested to ensure their continued effectiveness. Personal protective equipment will be provided only as a last resort as a means of controlling exposure to substances. Information, instruction and training will be given to employees exposed to substances hazardous to health.

6.5

[Display Screen Equipment](#)

The Highland Council will take all reasonable steps to secure the health and safety of employees who work with display screen equipment (DSE) including computers, laptops and PDAs. In particular arrangements will be made to:

- a) Identify all "users" of DSE in accordance with the regulations and maintain records of the same.
- b) Make arrangements for the assessment of each workstation taking into account the DSE, the furniture, the working environment and the worker.
- c) Take appropriate control measures in respect of risks identified as a result of the assessment process.
- d) Examine work patterns and incorporate changes of task within the working day to prevent intensive periods of DSE use.
- e) Review software to ensure that it is suitable for the task and is not unnecessarily complicated.
- f) Ensure that eye and eyesight tests are available for users of DSE.
- g) Ensure the supply of any corrective appliances (glasses or contact

lenses) where required specifically for use with DSE.

- h) Advise employees of the risks to health associated with DSE and how these are to be avoided.

6.6

Electricity at Work

The Electricity at Work Regulations requires the employer to maintain safe and efficient electrical systems, to prevent the harmful discharge of energy, assess the work activities which utilise electricity or which may be affected by it, and to define all foreseeable associated risks. In order to reduce the risks associated with the use of electricity at work, the Council will ensure that:

- a) electrical installations and equipment are installed in accordance with the Institute of Electrical Engineers (IEE) Wiring Regulations/BS7671 and associated guidance.
- b) All electrical installations to be periodically inspected and tested by suitably competent persons in accordance with BS7671 and a report prepared listing any defects and any non-compliances found.
- c) fixed installations are maintained in a safe condition by carrying out routine safety testing and ensuring staff report defects and concerns.
- d) portable and transportable equipment is inspected and tested frequently as required (the frequency will depend on the environment in which the equipment is used and the conditions of usage).
- e) Suitable test equipment is issued to staff involved in electrical testing
- f) safe systems of work for maintenance, inspection or testing are promoted and implemented.
- g) live working is forbidden unless it is absolutely necessary, and suitable arrangements have been made to prevent injury to the persons carrying out the work and anyone else who may be in the area.
- h) those who carry out electrical work are competent to do so. suitable personal protective equipment is provided if required to include special tools, protective clothing and insulating screening and such equipment is maintained in good condition.
- i) safety information is exchanged with contractors ensuring that they are fully aware of (and prepared to abide by) the Council's health and safety arrangements.
- j) detailed records in relation to the above are maintained.

6.7

Fire Safety

The Council will take all reasonably practicable steps to provide and maintain an environment that is safe from the effects of fire for all its employees, clients, and any other people who may be affected by its activities.

Managers must ensure that, as a minimum, the following arrangements are in place:

- a) The provision and maintenance of arrangements which allows

- persons to escape if a fire occurs.
- b) the provision and maintenance of plant and systems of work so that, so far as is reasonably practicable, the chances of a fire starting are kept as low as possible;
 - c) suitable arrangements to allow, so far as is reasonably practicable, for fire safety measures connected with the use, handling, storage and transport of flammable articles and substances;
 - d) the provision of such information, instruction, training and supervision as is necessary so that, so far as is reasonably practicable, the fire safety of its employees and other persons;
 - e) provision of fire risk assessments and a means of addressing any identified recommendations;
 - f) the allocation sufficient resources to meet the requirements of outcomes of the fire risk assessment;
 - g) Maintaining arrangements for co-ordination and co-operation with other employers where Council employees or clients share premises, facilities or activities with persons working in other organisations;

The minimisation of property damage is important but not if it jeopardises the safety of staff or members of the public. **The safety of life must override all other considerations at all times.**

6.8

First Aid

The Council will ensure that adequate equipment and facilities are provided to enable first-aid to be rendered to its employees if they are injured or become ill at work.

Each workplace will be assessed in relation to its size and location, the nature of the work undertaken and the number of employees to determine the appropriate provision of first-aid facilities.

Services shall put in place arrangements to ensure the replacement of useable items in first-aid boxes.

6.9

Food safety

The Council is committed to the principles of Hazard Analysis and Critical Control Points (HACCP) and Assured Safe Catering and will endeavour to identify potential hazards in all food handling operations. It will implement the controls and monitoring procedures at those points critical to food safety. Service management must ensure that they have in place arrangements for ensuring, so far as is reasonably practicable, safety and absence of risks to health in connection with the use, handling, storage and transport of articles and substances.

6.10

Gas Safety

All reasonable steps will be taken to secure the health and safety of employees, tenants, and others who use or operate gas appliances. In this respect the term gas refers to mains gas, liquefied natural gas and liquefied petroleum gases, i.e. propane and butane.

6.11

Hand Arm Vibration Syndrome

The use of vibrating tools can cause a range of conditions known collectively as Hand Arm Vibration Syndrome (HAVS), as well as specific diseases such as carpal tunnel syndrome. The effects include impaired blood circulation, damage to nerves, muscles, and loss of ability to grip properly. Without effective controls employees regularly using vibrating equipment could suffer from long term harm. The Council seeks to manage the risks to workers by:

- Assessing the risks from vibration exposure;
- Taking steps to reduce vibration exposure;
- Taking into account such risks when hiring/purchasing equipment;
- Providing training and information to employees
- Providing health surveillance

6.12

Health and Wellbeing at Work

The Council recognises the importance of employees being better able to perform effectively at work and enjoy an active life away from work when they are in good health. Preventing or reducing work related ill health ensures employees do not experience injury or harm and the Council complies with its legal requirements. Specific arrangements concerning work related ill health are dealt with in policy arrangements such as manual handling, display screen equipment, risk assessment, stress and occupational health.

Since both work activities and lifestyle factors can affect employee health, consideration must be given to promoting health related topics not arising from the work place or work activities. Lifestyle factors such as physical inactivity, smoking and poor diet can lead to major causes of ill health and be detrimental to work performance. Therefore, the Council accepts that to promote positive employee health is a benefit for employees and the Council. It is committed to developing an integrated approach to employee health, which includes:

- a) Provision of relevant information on a variety of health related topics
- b) Support and advice on how to improve health
- c) Identification of links between work activities, workplaces and employee health and where necessary implement suitable measures to reduce work related and non-work related health risks.

This will be achieved through shared knowledge and experience of relevant functions within Services and participation of employees and their Trade Union representatives. Where necessary assistance will be sought from external agencies or partnerships established to ensure current information and advice is available for employees.

6.13

Health Surveillance

The Highland Council is committed to a proactive approach to managing occupational health and safety. A programmed approach to health surveillance will help to meet this commitment as well as protecting the health of employees and evidencing

compliance with statutory requirements.

Health surveillance is any activity which involves obtaining information about employees' health and which helps protect employees from health risks at work. This may include self-checks, examination by a qualified person or a clinical examination by an occupational health physician.

6.14

[Incident Reporting and Investigation](#)

All accidents and incidents must be reported using the Council's accident report form.

Service Management has the responsibility to investigate all accidents, dangerous occurrences and near misses with the objective of identifying the cause and the appropriate steps needed to prevent a recurrence.

Major injuries, injuries resulting in absences of 3 or more days and notifiable dangerous occurrences must be reported to the Health and Safety Executive. The health and safety team should be notified at the same time.

In addition to management investigations, the health and safety team will investigate all reportable accidents to a level commensurate with their potential severity.

6.15

[Legionella](#)

The Council recognises the risk of infection from Legionella bacteria and will take all reasonable steps to implement an appropriate health and safety management system for water systems within Council premises to ensure that the necessary measures to prevent, or adequately control, the risk of exposure to Legionella bacteria are minimised. This management system will:

- a) Identify and assess sources of risk – including checking whether conditions are present which will encourage bacteria to multiply; whether there is a means of creating and disseminating breathable droplets and if there are susceptible people who may be exposed to the contaminated aerosols.
- b) Prepare a scheme for preventing or controlling the risks.
- c) Appoint a responsible person to manage the scheme
- d) Implement, manage and monitor precautions.
- e) Keep records of the precautions.

6.16

[Lifting Operations and Lifting Equipment](#)

The Council recognises that it has a duty to reduce the risks to employees and others from lifting operations. In order to assist the Council in discharging this duty, all Services must ensure that all lifting equipment provided for use at work is:

- a) Strong and stable enough for the particular use, and marked to indicate safe working loads;
- b) Positioned and installed in such a way as to minimise any risks;
- c) Used safely, i.e. the work is planned, organised and performed by competent people; and

d) Subject to ongoing thorough examination, maintenance and where appropriate, inspection by competent people.

Lifting equipment means work equipment for lifting or lowering and includes its attachments used for anchoring, fixing or supporting it, including fork lift trucks, vehicle lifting tables, cranes, hoists, passenger goods lifts, mobile elevating lifting platforms, chain blocks, etc.

Lifting accessory means work equipment used for attaching loads to a lifting machine. for example; shackles, slings, patient slings, fork extensions, engine lifting beams, etc.

All lifting equipment must have a valid Report of Thorough Examination. Each Service shall implement suitable measures to identify any lifting items without a Report of Thorough Examination and remove from service.

Each Service shall also have a process in place to ensure that when the competent person arranges a site visit all lifting items are available and presented for a thorough examination.

6.17

Local Exhaust Ventilation (LEV)

(See also section 6.4 COSHH)

The Highland Council recognises the need to assess the risk as to:

- a) How gasses, vapours, dusts and mists may arise or affect employees or others from work activities or processes managed by the Council.
- b) How contaminant clouds move with the surrounding air.
- c) The processes in the workplace which may be sources of airborne contaminants.
- d) The needs of the operators working near those sources.
- e) How much control will be required.
- f) How to prepare a specification for the LEV designer.
- g) What to tell the LEV provider.
- h)

A user manual, a log book and the requirement of thorough examination and test of LEV must be provided, on site, for each LEV system.

Staff carrying out routine checks of LEV equipment should be suitably trained to:

- a) Understand the LEV system and their function.
- b) Recognise a damaged part from a visual inspection.
- c) Understand the purpose of, and how to use, the measuring and assessment instruments and techniques.
- d) Check that the LEV system is delivering its design performance and is effectively controlling emissions exposure.

6.18

Lone working

The Council recognises that some staff are required to work by themselves in the community without close or direct supervision, sometimes in isolated work areas or out of office hours. Where the

conditions of service delivery or its associated tasks require staff to work alone, both the individual staff member and Managers have a duty to assess and reduce the risks which lone working presents.

6.19

Management of Contractors

The Council will monitor the activities of Contractors to minimise the risks presented to employees and to other persons on site or within Council buildings including members of the public.

The Highland Council in its employment of contractors recognises the need for an effective management control system to ensure the health and safety of all persons affected by contract works. In this respect the Council will make arrangements to:

- a) Select only contractors who can demonstrate that they have effective safety management systems in place and in particular those who:
 - i) Use only competent and adequately trained employees.
 - ii) Use only equipment, tools and materials that are maintained, stored and operated in a safe manner.
 - iii) Have health and safety responsibilities clearly defined and appropriate systems in place for communication on health and safety matters.
 - iv) Undertake adequate supervision and monitoring of their own health and safety performance.
- b) Produce specifications, exchange information with and acquire plans from contractors which deal with the health and safety issues as they develop at each phase of the work and which deal effectively with the risks involved.
- c) Maintain regular effective two-way communications which accommodate changes and unforeseen problems promptly.
- d) Monitor the health and safety performance of contractors
- e) Maintain lists of Approved Contractors taking into account the factors referred to above.

6.20

Manual Handling

The Council recognises that manual handling is one of the most common causes of absence through injury in the workplace and must be avoided, so far as is reasonably practicable. Where it is not possible to eliminate manual handling, assessments will be undertaken to determine the level of risk. Suitable controls will be introduced to reduce the risk of injury, including the risk of repetitive strain injury, to the lowest extent practicable, including training, use of mechanical aids, automation, redesigning the system of work or even the workplace itself. In most cases, manual handling assessments will be incorporated into generic risk assessments: however, a specific manual handling assessment will be carried out when required

6.21

Mental Health and Wellbeing

The Council is committed to developing a work environment and culture where employees can be open about their mental health without fear of stigma. Additionally, the Council aims to provide a supportive working

environment to those experiencing or recovering from mental ill-health. It is recognised that mental ill health need not be a barrier to effective working and that a positive working environment and appropriate support at work has a significant impact on reducing stress-related sickness absence and improving long-term outcomes for employees experiencing mental health problems.

6.22

Noise

The Council will put in place measures to protect employees from the risks of noise induced hearing loss and tinnitus, which can be caused by exposure to excessive noise. These measures will include:

- a) Assessing the risks from noise exposure
- b) Taking measures to reduce noise exposure where a risk assessment shows that this is necessary
- c) Ensuring the level of noise generated is taken into account when a new piece of equipment is purchased or hired
- d) Providing hearing protection where necessary if risks can not be adequately reduced by other means.
- e) Providing training and information for employees on the risks from noise and the measures in place to reduce these
- f) Providing health surveillance where the risk assessment shows that this is appropriate.

6.23

Occupational Health

The Council recognises the importance of Occupational Health for the health, safety and welfare of its employees. A comprehensive occupational health service is an integral part of the Council's policy to provide assistance to employees with health problems at an early stage and in responding to service delivery problems due to absence.

6.24

Pressure Systems Safety (PSSR)

The aim of PSSR is to prevent serious injury from the hazard of stored energy as a result of the failure of a pressure system or one of its component parts. The Regulations are concerned with steam at any pressure, gases which exert a pressure in excess of 0.5 bar above atmospheric pressure and fluid which may be mixtures of liquids, gases and vapours where the gas or vapour phase may exert a pressure in excess of 0.5 bar above atmospheric pressure.

Once a pressure system is installed, the primary duty for compliance rests with the user. To ensure compliance all relevant items of plant must have a written scheme of examination (written by a competent person). All items of plant will be examined by a competent person in accordance with the written scheme of examination. The user should ensure that a written scheme is available and the pressure system is being examined in accordance with the written scheme and a report of examination is obtained.

Pressure systems are also PUWER items therefore the requirements of PUWER also apply. The need for maintenance should not be confused with the requirement for examinations under the written scheme. They are two separate issues although problems identified during an

examination under the written scheme may require maintenance to correct.

Where the manufacturer/supplier has provided maintenance instructions for all or part of the system, these should form the basis of the maintenance programme. They should be supplemented as appropriate where they are not sufficiently comprehensive to cover the particular installation. In assessing whether the manufacturer's/supplier's instructions are sufficient, account should be taken of the complexity of the system, whether they cover the particular installation and reflect the on-site operation conditions.

6.25 [Purchasing/Hiring Equipment](#)

The Health and Safety at Work, etc. Act 1974 places a duty on employers to ensure that plant, articles and substances used at work are safe and without risks to health. This guidance will assist those who purchase or hire equipment so that the health and safety of employees is maintained.

6.26 [Radon](#)

The Highland Council recognises that where radon occurs in high concentrations (i.e. above 400 Bq/m³ in a workplace and 200 Bq/m³ in homes) it can present a foreseeable health risk. Exposure to high concentrations of radon over a period of time may increase the risk of developing lung cancer.

6.27 [Risk Assessment](#)

The Council acknowledges the importance of risk assessment in terms of its overall management of health and safety. Arrangements will therefore be made to ensure that risk assessments are carried out throughout the range of the Council's work activities and premises. In particular, the risk assessment process will:

- a) Identify hazards
- b) Determine who might be harmed and how, for example employees, clients, pupils and contractors etc.
- c) Determine the likelihood of harm occurring
- d) Identify appropriate measures necessary to control or eliminate the risk
- e) Record findings
- f) Arrange for monitoring and review

6.28 [Safe Driving at Work](#)

The Council recognises the need to protect employees and others from the hazards associated with work related driving, and as such the objectives of this policy are to ensure that:

- a) The principles of risk assessment are applied to work related driving
- b) The recognised hierarchy of control measures is considered with particular reference to eliminating the need for work related driving wherever possible
- c) Where work related driving cannot be avoided then appropriate

controls are introduced to reduce risk to an acceptable level
d) When assessing risks, factors such as driver competency, vehicle suitability and journey planning and scheduling are all considered.
e) Procedures are in place for checking licence and insurance documentation

6.29

Smoking at Work

The Managing Smoking at Work policy seeks to guarantee to employees the right to work in air free from tobacco smoke. Every employee should be made aware of the hazards associated with smoking and passive smoking. It is a major cause of disease and premature death.

There is a complete ban on smoking in all Council premises and their grounds. This includes the use of e-cigarettes and any recharging of such equipment. This ban also extends to Council owned vehicles and to vehicles used for carrying passengers on Council business.

6.30

Stress Management

The Council recognises that, whilst a degree of pressure can be a positive force at work, excessive pressure can have a negative effect on health and on performance.

To manage stress effectively, managers will promote and maintain systems of management and behaviour at work consistent with the principles and of the various strategies outlined in the stress management policy.

6.31

Vibration

Hand arm vibration syndrome (HAVS) and Whole Body Vibration (WBV) describe how the vibrations from powered hand operated equipment or vehicles can affect the individual. HAVS is a disease that can be caused by the use of vibrating tools. All cases of HAVS must be reported to the HSE.

The Council will put in place a range of measures to protect employees from the effects of vibrating equipment, including:

- a) Assessing the risks from vibration exposure
- b) Taking steps to reduce vibration exposure
- c) Taking into account vibration risks when purchasing or hiring equipment
- d) Providing training and information for employees on the risks from vibration and the measures in place to reduce these
- e) Providing health surveillance where the risk assessment shows that this is appropriate.

6.32

Violence

In order to ensure so far as is reasonably practicable, the health and safety of employees exposed to the risk of violence at work, the Council shall:

- a) Ensure that risks of violence are identified, assessed, reported and controlled as necessary.
- b) Establish a comprehensive recording system for acts of violence occurring throughout its range of Services.
- c) Provide support for employees who are the victims of violence.
- d) Provide training for employees to enable them to avoid and/or deal with actual and potential violence.
- e) Work in partnership with other agencies to develop strategies to reduce the incidence of violence at work.
- f) Ensure sufficient resources are available for the provision of appropriate control measures
- g) Ensure that the arrangements for dealing with violence at work are reviewed at suitable intervals.

6.33

Work equipment

Service Directors shall have in place measures to ensure:

- a) All staff are suitably trained on how to safely use work equipment that they may be required to use as part of their normal duties.
- b) All work equipment supplied by The Highland Council should be suitable for the task required of that equipment.
- c) All staff that use work equipment should be instructed to perform pre use checks of equipment they are trained to use, so that the equipment remains safe and suitable for continued service.

If faults are found on work equipment each service shall implement suitable measures to remove the faulty equipment from service. User guides and instruction manuals should be available for users of work equipment. All controls on work equipment should be clearly marked with their mode of operation. All capacities of work equipment should be clearly and permanently marked in units understood by the user. Arrangements must be made for all work equipment to be suitably maintained, inspected and examined as applicable by the manufacturer and other statutory regulations.

Note: Gym equipment is included in the term “work equipment”. Additional guidance on the use, inspection and maintenance of gym equipment will be developed

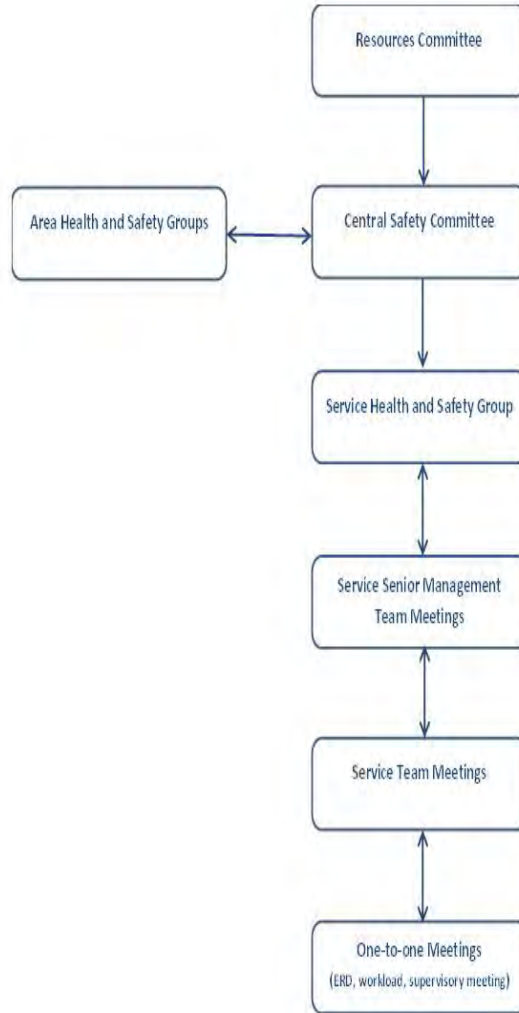
7.

Monitoring and review

7.1

This policy will be reviewed on an annual basis by the Occupational Health, Safety and Wellbeing Manager.

Health, safety and wellbeing consultation



Policy and guidance on the management of radon in workplaces owned and managed by Highland Council.

Version 2 - May 2015

1. Policy Statement

- 1.1 The Highland Council recognises that where radon occurs in high concentrations (i.e. above 400 Bq/m³ in a workplace and 200 Bq/m³ in homes and workplaces where sleeping accommodation is provided) it can present a foreseeable health risk. Exposure to high concentrations of radon over a period of time may increase the risk of developing lung cancer.
- 1.2 This policy has been developed in line with the general principles outlined in the Council's Occupational Health, Safety and Wellbeing Policy and deals with the arrangements for managing radon in the workplace, and on sites or properties owned or managed by the Council, including Council houses.
- 1.3 Where Services occupy premises which are not owned/managed by the Council they should ensure that the presence of radon is managed by a system comparable to that described in this document.

2. Radon

- 2.1 Radon (more properly known as Radon-222) is a naturally occurring, colourless, odourless radioactive gas. It is formed within the ground where uranium and radium are present and can seep out through cracks and fissures within the subsoil into the atmosphere or spaces beneath and in buildings.
- 2.2 The Public Health England (PHE) has produced an indicative atlas of Radon in Scotland which shows the probable presence of radon in dwellings and areas within the Highlands.
- 2.3 PHE advises that all properties should be classified according to

probability that a home in the locality will have an indoor radon concentration level at or above the action level. The action level for homes at this time is set at 200 Bq/m³.

- 2.4 Properties with a probability of between 1% and 10% are regarded as intermediate, while areas with more than 10% probability are regarded as higher radon probability areas. Areas with less than 1% are referred to as 'lower' radon probability areas.
- 2.5 For existing properties, Highland Council aim to prioritise properties in the higher radon probability areas initially, followed by intermediate areas.
- 2.6 This identifies the following Highland areas as being in the higher radon probability areas:
- Sutherland (Helmsdale)
 - Great Glen (Fort Augustus)
 - Aviemore and Badenoch

3. Radon Action Levels

3.1 Workplaces

The statutory workplace action level is 400 Bq/m³. Where this is reached, the Ionising Radiation Regulations 1999 apply. Remedial action must be taken promptly to reduce radon and the Council must notify HSE. (Note: for workplace measurements the radon reading used is the annual maximum radon concentration.)

3.2 Housing

PHE recommends that radon levels should be reduced in homes where the annual average radon concentration is more than 200 Bq/m⁻³. This domestic Action Level has been endorsed by the Government.

3.2.1 For Council housing, the Council as a landlord is required to take action if the annual average radon concentration in a property is at or above the Action Level of 200 Bq/m⁻³.

3.2.2 PHE have also set a domestic Target Level of 100 Bq/m⁻³ which is the ideal outcome for remediation works in existing buildings and protective measures in new buildings.

3.3 Schools, hostels, residential homes

PHE recommend that that the domestic Action Level and Target Level are applied to non-domestic buildings with high public occupancy (>2000 hours per year) and to all schools. (Note for domestic measurements the radon reading used is the annual average radon concentration.)

3.3.1 Where the Council's monitoring programme identify properties above the appropriate action level, remedial works or other control measures will be taken to bring radon levels below the action levels. The Council will aim to bring radon levels as low as is reasonably practicable and in appropriate premises below the domestic target level.

3.3.2

It must be noted that there can be considerable challenges in applying remediation measures to existing buildings and radon levels can vary considerably depending on a number of factors. In the unlikely situation of levels remaining above action levels following appropriate remedial works the Council shall seek advice from HSE, PHE and specialist consultants on the most appropriate course of action. This may involve occupancy restrictions.

4. Health implications

4.1

Most radon gas breathed in is immediately exhaled and presents little radiological hazard. However the decay products of radon behave more like solid materials and are radioactive. These particles attach to atmospheric dust and water droplets which are then breathed in and become lodged in the lungs and airways. Some decay products emit harmful radiation called alpha particles which can cause significant damage to the sensitive cells in the lungs.

4.2

Radon contributes by far the largest component of background radiation dose received by the UK population and, while the largest radon doses arise in domestic dwellings (due to the longer time spent there), significant exposures are possible in workplaces. Epidemiological studies on occupational groups with known high exposure to radon show a significantly increased risk of lung cancer.

4.3

PHE studies show that the magnitude of risk from radon is such that exposure to 100 Bq m³ over 30 years increases the risk of lung cancer by 5-31%. The absolute risk is estimated as being 25 times greater in smokers than non-smokers.

4.4

PHE reports that the dose-response relationship appears linear, and that there is no evidence of a concentration below which there is no risk.

5.

Arrangements

5.1

Health and safety legislation places responsibility for meeting safety requirements on those that own or manage workplaces or property. The owner or manager has a specific duty of care to ensure that their property or area of responsibility is safe for those who use it and for those who work there or others who have access to that environment.

5.2

In the case of radon gas, if this duty of care is not achieved then it could:

- a) Create the potential for harmful levels of radon to infiltrate the atmosphere in buildings.
- b) Create the potential for building users/occupiers to develop ill health, e.g. lung cancer, from exposure over a long period of time to harmful levels of radon.

5.3 The Highland Council will take all reasonable measures to ensure the health and safety of its tenants, employees and those other persons affected by their work activities who may be exposed to the risks from radon in occupied properties or sites under the control of the Council.

5.4 Although this document is concerned primarily with **workplaces**, similar arrangements will be put in place by the Director of Community Services to manage the risk of exposure to radon to householders.

6. Responsibilities

6.1 General health, safety and wellbeing responsibilities are detailed in the Corporate Occupational Health, Safety and Wellbeing Policy. Specific responsibilities in relation to the management of radon are detailed below.

6.2 Directors shall be responsible for ensuring that this policy, and any relevant Service policies are implemented and that arrangements are monitored.

6.3 Director of Community Services is responsible for appointing a senior officer from the Environmental Health team for the coordination of radon protection within the Highland Council. This officer will be the main liaison between the Council and Health and Safety Executive and PHE.

6.4 **Director of Development and Infrastructure** is responsible for

- Ensuring that all contract and engineering works are undertaken in accordance with best practice and in a manner that eliminates, reduces, or controls identified radon risks;
- Ensuring that a data base of Highland Council properties is maintained which indicates the potential presence of radon based on PHE Scotland atlas records;
- Ensuring that Property staff meet with client representatives on a regular basis to assist in the provision of property advice, or related matters, for use when carrying out risk assessments;
- Ensuring that regular, recorded inspections and testing are undertaken to ensure that any radon protection works are undertaken to the required standard and that any control measures are performing satisfactorily;
- Ensuring that Property staff compile and manage a mitigation works list and ensure that client representatives are made fully aware of the issues and the manner by which residual risks from radon infiltration can be managed, such as, restricted access arrangements and systems of work.
- Ensuring that all Highland Council controlled workplaces in radon affected areas will be subjected to a risk assessment which incorporates risks from radon (based on available data);
- Ensuring that all work activities/services with the potential to cause harm as a result of the presence of high levels of radon infiltration are subjected to risk assessment with appropriate protective precautionary measures; and
- Ensuring that radon levels are measured and monitored in all

workplaces assessed as high risk.

6.5

Responsible Premises Officers (RPO) shall be responsible for:

- maintaining on-site all records pertaining to radon control measures including risk assessments and inspection reports.
- ensuring that any radon protection measures provided to control radon infiltration are properly maintained and regularly monitored to ensure effectiveness. (The level of protection will range from full to basic depending on the actual measured levels of radon and the location.)
- ensuring that control measures are followed
- communicating with local staff

(Note: if you occupy a PPP school, the procedure may differ from that described above and you should seek clarification from the PPP Projects Officer in the first instance.)

6.6

The Occupational Health, Safety and Wellbeing Manager shall be responsible for ensuring that the health and safety team monitor the performance of the Council's radon policy and procedures.

7.

Information and Training

7.1

The Council will provide sufficient information, instruction and training to ensure full understanding of the health posed by radon in the workplace, and the importance of the management and control measures provided.

7.2

Information shall be provided by personal communication, articles in council newsletters and intranet site and the cascading of information within the council consultation network.

7.3

Employees who have a specific role to fulfil with the management of radon within the Highlands will be provided with suitable and sufficient training and information to ensure so far as is reasonably practicable their health, safety and wellbeing whilst at work.

7.4

Training needs are likely to include radon awareness briefings and familiarisation with this policy and guidance.

7.5

All employees (e.g. building maintenance personnel) contractors and others who may work in radon affected areas shall be given information regarding the safe operation of all engineering controls such as switches, radon barriers, ventilation systems, sump controls, fans, vents, etc.

7.6

BRE have developed an online training module entitled "Radon Awareness". The course covers health risks from radon, measurement, radon pump systems, floor void ventilation and positive ventilation. This module would be suitable for persons involved in the management and control of radon such as maintenance officers, advisers and risk assessors. Further details can be sourced at: www.bre.co.uk (Telephone 01923 664829 or email train@bre.co.uk)

- 7.7 The Health, Safety and Wellbeing team can provide further advice and guidance on training for Council staff
healthsafetyandwellbeing@highland.gov.uk

8. Risk assessment

- 8.1 Highland Council will prioritise the assessment the health and safety risks from radon in workplaces in the following circumstances:
- All below ground workplaces (occupied greater than 1 hr/pwk, 52hrs/pa or those containing an open water source.
 - All workplaces located in radon affected areas.
- 8.2 To assist with the assessment of the risks from radon in the workplace the assessor will need to consult the PHE maps to determine the likely extent of the radon hazard in that area. In the event that the premises are not located in an area of higher than 1% probability then the assessment will require no further action other than monitoring and review.
- 8.3 Public Health England (who have a radon role for the whole of the UK) have a radon hotline number for further guidance – contact **01235 822622**

9. Radon measurements

- 9.1 The radon concentration in buildings is determined by various factors including the geology of the ground beneath the building, details of the way the building is constructed, and factors such as the method of heating and of ventilation.
- 9.2 Measurement surveys are made using passive integrated detectors in each premise. The detectors are left in position for a nominal period of three months and the results combined to reflect typical occupancy. Individual detectors should not be placed near major sources of heating and ventilation.
- 9.3 Indoor levels are usually higher in colder temperatures; therefore testing should normally be conducted in winter months. Where this is not possible adjustments will be required to compensate for seasonal variations and average outdoor temperature variations.
- 9.4 Detectors can be sourced from PHE and can be returned for analysis after the survey period. PHE will provide for a free retest after any remediation works have been carried out.
- 9.5 Local maintenance officers and RPO will need to co-operate and liaise to ensure that there are sufficient detectors and that they are positioned safely and effectively.
- 9.6 The measurements will determine the degree of remedial action that may be required if any to help eliminate or reduce the level of radon infiltration.

9.7 The survey results should be recorded in the property logbook and communicated by the RPO to all who use the premises. The Highland Council website will also contain details about radon safety for public use. Specific queries regarding measurement and any protective measures should be communicated via the PHE and the area property maintenance section.

9.8 Highland Council will seek to encourage home testing to tenants who live in radon affected areas.

9.9 Residents who have concerns about radon in the area where they live or work within the Highlands should be encouraged to contact their local Environmental Health office or review the literature and information available online at the PHE and BRE websites

10. Radon protection measures

10.1 The Buildings Research Establishment (BRE) has produced guidance on cost effective remedial measures to mitigate radon ingress in buildings.

10.2 There are many practicable and relatively inexpensive measures that can be taken to combat radon ingress in buildings. The choice of mitigation system will rest primarily on its ability to reduce radon concentrations to below the appropriate action level. The measures will consider the cost and practicability to reduce radon concentrations to as low as reasonable practicable.

10.3 Some possible measures include:

- Sealing large gaps in floors and walls connected to ground
- Improved under floor ventilation – install plastic vent blocks
- Improved internal ventilation
- Provision of a ventilated sub floor
- Fitting of a sealed radon proof barrier/membrane
- Provision of a radon sump and extraction pipe work

10.4 The likely effectiveness of the solutions based on the actual floor types and other details can be viewed at www.bre.co.uk/radon/sumps.html and further information can be gained from the BRE dedicated radon advice helpline: **01923 664707**

10.5 Once mitigation measures have been installed, details of the system and test results should be recorded on the appropriate council property database.

11. Control of Exposure

11.1 Areas which have been identified as exceeding the radon action levels through testing will require appropriate controls to safeguard employees and occupants of the building. This will include the design and Installation of appropriate remediation systems.

- 11.2 Where it is deemed impractical to reduce radon concentration levels by engineering measures it may be necessary to consider restricted access to the area.

12. Monitoring

- 12.1 Arrangements for monitoring the management of Radon will be reviewed regularly to ensure their effectiveness. This role will be predominantly be undertaken by Area Housing and Property personnel and the corporate health safety and wellbeing team in consultation with the various service groups.
- 12.2 Any incidents involving radon shall be reported to the Corporate Occupational Health Safety and Wellbeing Team and investigated in accordance with the corporate policy on accidents reporting and investigation.
- 12.3 Local CS staff shall ensure that all engineering measures taken to reduce radon within premises within their area of control are subjected to planned inspection and maintenance regimes. These will help to ensure that mitigation measures remain effective, e.g. fans switched on.

13. Policy review

- 13.1 This policy and associated guidance shall be reviewed on an annual basis or as significant changes dictate.

Title	Date of Last Issue or Review	Resp. Officer	Date of annual review	Comment on review	CSC Date	Resources	Date of Next Review
COHSW Policy	2015	OHSW Mgr	Dec-14	Update required	May-15	✓	May-16
Accident Reporting and Investigation Policy	2014	OHSW Mgr	Dec-15		Feb-16		Feb-16
Control of Asbestos	2009	PRMT					
Control of Substances Hazardous to Health	1998	OHSW Mgr	Jan-15	Update required	Feb-16		
Display Screen Equipment	1998	OHSW Mgr	Nov-14	Rewrite required	May-15		Feb-17
Driving at Work	2010	OHSW Mgr	Nov-14	Cross service working group reviewing policy and associated	May-16		
Dyslexia Strategy	2013	OHSW Mgr	Nov-14	No change required	N/A		Nov-15
Electricity at Work	1998	PRMT					
Fire safety	2013	FSA	May-15		Nov-15		
First Aid	2013	MHC	Jun-15		Aug-15		
Food Safety	2000	OHSW Mgr	May-15				
Gas Safety	2006	PRMT					
Hand and Arm/Whole Body Vibration	No date	SHSA	Feb-15	Rewrite required	May-15		
Health and Safety Consultation	2012	OHSW Mgr	Apr-15		Nov-15		
Health and Safety Training	2012	OHSW Mgr	Apr-15		Nov-15		
Health Surveillance	2013	OHSW Mgr	Apr-15	To be reviewed as part of Improvement Notice	May-15		
Hot Water Management	2005	MHC	Jul-15		Aug-15		
Infection Control (including BBV and immunosation)	2004	RSOH	Jun-15		Nov-16		
Legionnaires' Disease	2002	PRMT					
Lone Working	2012	OHSW Mgr	Nov-14	Update once high risk working controls agreed	Feb-16		
Management of Contractors	2004	OHSW Mgr	Feb-15	Rewrite required	Feb-16		
Management of Stress	2002	OHSW Mgr	Feb-15	Rewrite required			
Manual Handling Operations	1998	MHC	Nov-14	Drafted - incorporate Manual Handling Passport	May-15		
Mental Health and Wellbeing Policy	2013	OHSW Mgr	Dec-14	Await training evaluation	May-16		
Monitoring Protocol	2014	OHSW Mgr	Dec-15		Feb-16		Dec-15
Occupational Health	2011	OHSW Mgr	Apr-16	To be reviewed following re-procurement exercise	Aug-16		Apr-16

PPE/RPE	N/A	SHSA	N/A	Drafted	Aug-15		Aug-16
Radon	2015	OHSW Mgr	Dec-14	Updated	Feb-15	✓	Feb-16
Risk Assessment	2011	OHSW Mgr	Dec-14	Update required	Aug-15		Aug-16
Risk Assessment For New And Expectant Mothers At Work	2004	OHSW Mgr	Feb-15	Update required	Aug-15		Aug-16
Safety Reps Charter	2014	OHSW Mgr	Jan-17		May-17		Jan-17
Smoking at Work	2015	OHSW Mgr	Dec-14	Updated	Feb-15		Feb-16
Violence and Aggression	2012	OHSW Mgr	Mar-15	Need to gather feedback from Service Co-ordinators	Nov-15		
To be developed							
Control of Construction Projects		PRMT					
Portable Electrical Appliances		OHSW Mgr		Drafted. To be reviewed by OSHW Team.	Aug-15		
Noise at Work		SHSA		In development	Aug-15		
Personal Protective Equipment/Respiratory Protective Equipment		SHSA		In development	Aug-15		
Positive Purchasing Policy		OHSW Mgr		In development. Required as part of Improvement Notice	May-15		
Work at Height		SHSA					
Work Equipment, Lifting Equipment, and Lifting Operations		OHSW Mgr					

Legend

OHSW Mgr OHSW Manager
SHSA Senior H&S Adviser
FSA Fire Safety Adviser
MHC Moving/Handling Co-ordinator
PRMT Property Risk Management team
RSOH Occ Health Provider