
To: Finance, Resources and Customer Services Policy board
On: 28 March, 2018

Report by: Director of Finance and Resources

Heading: Revised Corporate Health and Safety Policy 2018

1. Summary

- 1.1 The Council recognises the importance of effective identification, evaluation and control of, any risks which employees and others affected by the Council's undertakings may be exposed to. It is therefore necessary to ensure the continued application of an effective Health and Safety Management system within the Council. The Corporate Health and Safety Policy has been revised to reflect legislative changes and best practice and to continue to meet the requirements of the Health and Safety at Work etc. Act 1974.
- 1.2 The aim of this revised policy is to continue to provide a health and safety framework which defines corporate responsibilities and assists directors to:
- control the risks to employees and others who may be affected by their Service's undertakings;
 - comply with current legislation;
 - promote best practice; and
 - continually improve on health, safety and well-being.
- 1.3 In line with the Councils' health and safety system review process, this policy updates and replaces the Renfrewshire Council Health and Safety Policy approved and adopted in February 2015.
- 1.4 The health and safety policy continues to promote the Council's approach towards a management-led health and safety culture that embraces and complements the Council and Community plans and also promotes and encourages Service ownership of health and safety.

2. Recommendations

- 2.1 It is recommended that the Board notes the content of the policy and approves it.
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3. Background

- 3.1 The Health and Safety at Work etc. Act 1974 and the Management of Health and Safety at Work Regulations 1999 (as amended) place duties on the Council to ensure, so far as is reasonably practicable, the health, safety and welfare of their employees at work.

- 3.2 The Health and Safety at Work etc. Act 1974:

- Section 2(1) states "It shall be the duty of every employer to ensure, so far as is reasonably practicable, the health, safety and welfare at work of all of his employees"
- Section 2(3) requires that an employer with five or more employees must prepare, and revise as appropriate, a written health and safety policy statement, together with the organisation and arrangements for carrying it out, and bring this to the notice of the employees.

- 3.3 The Management of Health and safety at Work Regulations 1999 (as amended):

- Employers are required to manage the health and safety aspects of their activities in a systematic and responsible way. The Regulations include requirements for risk assessment, the availability of competent health and safety advice and emergency procedures.

- 3.4 Important elements in the Council's management of health and safety are:

- the operation of Services Health and Safety Planning Groups which effectively monitor, plan and implement health and safety management systems throughout their respective Service;
- having in place Service Health and Safety Policies in line with the obligations of the Corporate Health and Safety Policy;
- annual Service health and safety reports and action plans, which include safety performance indicators developed and

approved by the respective Council boards.

Key Changes

4.0

4.1

The Corporate health and safety policy continues to promote the Council's approach towards a management-led health and safety culture that reflects and complements the Council and Community plans and also promotes and encourages Service ownership of health and safety. Salient points are:

1. The revised policy reflects the ethos of continuous improvement which is a fundamental principle of BS OHSAS 18001:2007 and the recently revised Health and safety Executive's guidance document "Managing for Health and Safety" (HSG 65).
2. There are no significant changes to individual roles and health and safety responsibilities.
3. The changed language within the policy reflect the mature health and safety system within the council, points to note in particular are:
 - Part 2, health and safety assistance: reaffirming who the competent persons are, including a stronger reference to the health and safety team as well as occupational health.
 - Part 3, Risk Identification 2.5.1; revised wording and list of potential risks.
 - Part 3, the addition of the plan, do, check, act model.

Implications of the Report

1. **Financial** - *None*

2. **HR & Organisational Development** - *This report supports the Council's commitment to the health, safety and wellbeing of employees*

3. **Community/Council Planning** –

- *Our Renfrewshire is well* – *This policy supports the wellbeing of our employees.*

- *Our Renfrewshire is safe – This policy provides arrangements to ensure the safe delivery of our services*
4. **Legal** – *This policy ensures legal compliance with The Health and Safety at Work etc. Act 1974 and all subsequent legislation*
 5. **Property/Assets** – *This policy will ensure that statutory compliance will be achieved at all Council controlled properties.*
 6. **Information Technology** - *None*
 7. **Equality & Human Rights** -
 - (a) The Recommendations contained within this report have been assessed in relation to their impact on equalities and human rights. No negative impacts on equality groups or potential for infringement of individuals' human rights have been identified arising from the recommendations contained in the report because it is for noting only. If required following implementation, the actual impact of the recommendations and the mitigating actions will be reviewed and monitored, and the results of the assessment will be published on the Council's website
 8. **Health & Safety** – *This policy sets out fully the arrangements to which the corporate health and safety governance model will be applied.*
 9. **Procurement** – *This policy supports the arrangements for the appointment and control of contracted services through the procurement team.*
 10. **Risk** – *This policy supports the arrangements for identification and control of risks arising from the councils' undertakings.*
 11. **Privacy Impact** – *No impacts were identified.*
 12. **Cosla Policy Position** – *not applicable.*

List of Background Papers

- (a) Background Paper - none

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Corporate Policy Document Health and Safety

Corporate Policy on Health and Safety

Finance and Resources
HR and Organisational Development
Health and Safety

FOREWORD

This Health and Safety policy is designed to contribute to the business performance of Renfrewshire Council as part of a demonstrative commitment to the continuous improvement in health and safety performance.

Managers are responsible for motivating and empowering employees to work in a safe and healthy manner and to demonstrate and encourage a positive attitude towards health, safety and well being in the workplace.

This document requires the commitment, support and action from everyone working within Renfrewshire Council and will be central to the ongoing effective management of health and safety.

To this end, I commend this document to you.

Chief Executive
Renfrewshire Council

19th **March 2018**

INTRODUCTION

This policy updates and replaces the Renfrewshire Council Health and Safety Policy approved and issued February 2015

The policy reflects the legal obligations placed upon Renfrewshire Council by the Health and Safety at Work etc. Act 1974 and the Management of Health and Safety at Work Regulations 1999 (as amended).

It is supported by Service Health and Safety Policies. These Service policies detail the organisation and arrangements in force and the procedures in place for its successful implementation at a local level.

The enforcement authority for Health and Safety legislation for Renfrewshire Council lies with the Health and Safety Executive (HSE).

PART 1

RENFREWSHIRE COUNCIL

GENERAL STATEMENT OF HEALTH AND SAFETY POLICY

Renfrewshire Council will take all reasonably practicable steps to ensure the health, safety and well being at work of its employees and all other persons who may be affected by its undertakings.

The Council is committed to the objective of continually improving health and safety performance in the delivery of its Services.

This standard will be achieved by:

- a) Creating and maintaining a positive health and safety culture which ensures the commitment and participation of all employees;
- b) Meeting its responsibilities to employees, other persons and to the environment in a way which recognises that legal requirements are the minimum standard;
- c) Adopting a planned and systematic approach to the implementation of the Council's Health and Safety Policy to ensure:
 - i) The provision and maintenance of plant and systems of work that are, so far as 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 as is necessary to ensure, so far as is reasonably practicable, the health and safety at work of its employees and other persons;
 - iv) Any place of work under the Council's control must provide safe access and egress, without risks to health, so far as is reasonably practicable; and
 - v) The provision and maintenance of a working environment for employees that is, so far as is reasonably practicable, safe, without risks to health, and adequate as regards facilities and arrangements for their well being at work.
- d) Identifying and assessing the risks associated with all undertakings of the Council with the aim of eliminating or controlling the risks, so far as is reasonably practicable;

- e) Allocating resources to meet the requirements of the Council's Health and Safety Policy;
- f) Planning for health and safety including 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; and
- h) Maintaining an effective system of joint consultation with trade union appointed safety representatives and, where elected, non trade union representatives of employee safety, as appropriate, and providing safety representatives with appropriate resources to enable them to carry out their functions.

The effectiveness of this policy relies on all employees accepting responsibility for its implementation and adhering to the relevant policies, procedures and standards.

Signed:
(Chief Executive)

Date: 19th March 2018

PART 2

THE ORGANISATION AND RESPONSIBILITIES FOR HEALTH AND SAFETY

This Health and Safety Policy is supported by Service Health and Safety Policies. Safe systems of work will be implemented across the Council as a result of an effective health, safety and strategic risk management process.

Health and Safety Assistance/Advice

The Director of Finance and Resources (FAR) and Head of HR and Organisational Development (HR and OD) have overall responsibility to ensure that advice on matters relating to health, safety and well being at work is provided throughout the Council.

The FAR, HR and OD, Health and Safety Section and Occupational Health Professionals, as competent persons, will provide support through the Head of HR and OD in order to achieve this.

Organisational Responsibilities

An outline of the responsibilities of the Chief Executive, Directors and Employees are set out below.

Chief Executive

The Chief Executive, so far as is reasonably practicable, is responsible for ensuring the health, safety and well being at work of Council employees and others who may be affected by Renfrewshire Council's undertakings. This will be achieved by:

- a) Detailing the organisation in the Council through which the policy will be implemented and delegating the duty for implementation of the policy to the Directors of each Service;
- b) Ensuring adequate resources are available to enable the Council's Health and Safety Policy to be implemented;
- c) Visibly demonstrating management's commitment towards **maintaining** a positive health and safety culture by promoting and encouraging high standards of health and safety performance;
- d) Appointing competent persons to assist the Council in overseeing the application and provision of health and safety legislation. Under the Management of Health and Safety at Work Regulations 1999 (as amended), the FAR Health and Safety Section will provide such advice, guidance and assistance to Services with regard to the implementation of this policy.

- e) Ensuring the maintenance of effective health, safety and wellbeing management systems within Services to reduce and control risks: and
- f) Monitoring and reviewing health, safety and wellbeing performance on a regular basis to ensure that high standards are maintained.
- g) Demonstrate a visible commitment to health and safety leadership by setting a good personal example to employees, service users and others.
- h) The Chief Executive gives executive authority to authorised Health and Safety Officers (in the event of an imminent risk or danger to the health and safety of employees, contractors or others including members of the public) to prohibit any such work activity undertaken on or on behalf of the council. Any such action must be notified to the Chief Executive and Head of Service.

Directors

Directors are, so far as is reasonably practicable, responsible for ensuring the health, safety and well being at work of employees and others who may be affected by the undertakings in their respective Services. In particular, they will:

- a) Prepare and revise, in accordance with legislative requirements, their Service Health and Safety Policy, which identifies the key risks related to Service undertakings;
- b) Set out the organisational responsibilities within their Service through which the Policy will be implemented;
- c) Set out the arrangements which will assist to control Service risks, as outlined in the Service Health and Safety Policy;
- d) Ensure adequate resources are available to enable the Service Health and Safety Policy to be implemented;
- e) Implement and introduce measures to achieve and continually improve standards of health and safety performance within their Services in order to develop a positive attitude to health and safety amongst employees, contractors and service users;
- f) Implement and maintain an effective health and safety management system, which will include assessing, planning, organising, monitoring and reviewing the measures required to eliminate, reduce or control service risks;
- g) Monitor and review health and safety performance on a regular basis to ensure that high standards are maintained and compile reports on a quarterly basis to the Corporate Health and Safety Committee (CHSC).

- h) Prepare an annual report in accordance with the Council's Health and Safety Plan, evaluating the health, safety and wellbeing at work performance of their Service and setting future objectives and measurable targets including performance indicators;
- i) Demonstrate a visible commitment to health and safety leadership by setting a good personal example to employees, Services users and others; and
- j) Bring to the attention of Heads of Service, Managers and Supervisors that health, safety and well being is a shared responsibility, and that they will be accountable for the health safety and well being of employees or others who may be affected by the work of the Service.

Employees

All employees are reminded that health, safety and wellbeing is everyone's responsibility and that co-operation is required to implement Council and Services' Health and Safety Policies, procedures and safe systems of work by:

- a) Acting in the course of their employment with due care for their own safety and that of others who may be affected by their acts or omissions at work;
- b) Co-operating, so far as is necessary, to enable the Council to perform any duty or to comply with any arrangement, as a result of health and safety legislation which may be in force (for example correct use of personal protective equipment or attending health surveillance);
- c) Using work equipment correctly, safely and in accordance with appropriate training and instruction; and
- d) Bringing to the attention of their manager or supervisor, any situation they would reasonably consider, that represents a concern about health, safety and wellbeing whilst at work.

PART 3

ARRANGEMENTS

The following arrangements will be incorporated into Service's own Health and Safety Policies where necessary. They should be expanded or altered to meet the specific requirements of the Service concerned, and developed with the support of the FAR Health and Safety Section.

Arrangements will be based on the HSE publication '**Successful Health and Safety Management (HSG65)**' **Plan – Do – Check – Act** methodology (illustrated below). The HSE states that "The Plan, Do, Check, Act approach achieves a balance between the systems and behavioural aspects of management. It also treats health and safety management as an integral part of good management generally, rather than as a stand-alone system".



Services will pursue progressive improvements which should lead to reduction of injury and ill health. This will be achieved by the implementation and management of an effective health and safety management system.

1.0 Health and Safety Culture

1.1 Leadership, Commitment and Involvement

Leadership and commitment are critical to the success of the health and safety management system within the Council and requires the involvement of everyone. Visible leadership and commitment of management at all levels is an essential component to create the required positive health and safety culture. Managers must:

- set a personal example;
- communicate the importance of health, safety and wellbeing considerations into business decisions;
- openly discuss health, safety and wellbeing matters and include this as a standard item on meeting agendas;
- encourage employees to suggest health, safety and wellbeing performance improvement measures;
- reward positive behaviours and the achievement of health, safety and wellbeing objectives; and
- take disciplinary action where considered appropriate for breaches of health, safety and wellbeing guidelines, procedures and rules.

1.2 Commitment

Council services recognise that employees have an important contribution to make to the overall organisational health, safety and wellbeing culture. The Council will ensure that health and safety remains to be an integral part of the management system. The Council will drive to maintain a positive attitude to health, safety and wellbeing amongst employees by:

- visibly demonstrating a clear commitment to improving health, safety and welfare performance by setting and monitoring measurable objectives;
- promoting co-operation and consultation across Services by identifying common work interfaces and sharing and agreeing best practice;
- ensuring the communication and dissemination of necessary health, safety and wellbeing information throughout the Council and confirming understanding and acceptance of the information;
- ensuring and encouraging participation of employees at health and safety groups and meetings; and
- securing the competence of employees by including health, safety and wellbeing information within the recruitment process and systematically identifying and providing appropriate training.

1.3 Health and Safety advice

The Health and Safety Section will provide guidance, advice and support to assist in ensuring the health, safety and well being of employees and anyone who may be affected by the Council's undertakings.

The Occupational Health Service is managed by the health and safety section and is committed to the identification, assessment and management of work related health risks, and as appropriate, non work related health risks.

1.4 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 in-house induction course and, in addition, be offered the opportunity to access online the ilearn course 'First Impressions' developed by FAR, HR and OD. Where health and safety training needs are identified by a Service, suitable training can be arranged through Organisation and Development. Health and safety training courses available are included within the FAR Training Course Planner, which is available from Organisational Development and on the Council's intranet site, Renfo.

The Health and Safety Section may provide bespoke health and safety training on request, at times and locations suitable to the Services' requests.

1.5 Service Health and Safety Co-ordinators

The Service Health and Safety Co-ordinator is not a Health and Safety Officer but supports their own service internally.

The purpose of a Health and Safety Co-ordinator is to:

- co-ordinate health, safety and wellbeing issues within each service;
- represent their service at the Corporate Health and Safety Committee;
- champion health, safety and wellbeing across their service.

Further guidance on the role is available from the Health and Safety Section.

1.6 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 can 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. On request, they will also be given information necessary to carry out their functions as defined under the Safety Representatives and Safety Committees Regulations 1977.

Services will consult the relevant Safety Representatives in accordance with the current Council policy as it relates to staff, health, safety and wellbeing.

1.7 Raising Health and Safety Concerns

Should an employee feel that they need to raise a health, safety and welfare concern, the procedure detailed below should be followed in line with service procedures:

- STAGE 1. Raise concern with their Supervisor. If not resolved;**
- STAGE 2. Raise concern with the Supervisor's Manager. If not resolved:**
- STAGE 3. Raise the concern with the Safety Representative. If not resolved;**
- STAGE 4. Safety Representative can raise concerns at the relevant Service's health and safety management forums. If not resolved;**
- STAGE 5. Raise the concern at the Corporate Health and Safety Committee.**

At any stage during this process, **or if there is an immediate concern**, any employee/safety representative can contact **FAR** Health and Safety Section for further advice and guidance.

2.0 Planning and Implementation

2.1 Corporate Health and Safety Plan

The Chief Executive will ensure, through the Head of HR and OD, that a Corporate Health and Safety Plan is in place which will achieve and support effective health and safety management systems across the Council.

Services will prepare a Health and Safety Plan outlining specific service health and safety objectives, which are measurable, with realistic timescales for their accomplishment. These objectives will be developed in consultation with the health and safety section.

All health and safety plans must be regularly monitored by the Service health and safety planning groups and reviewed on a regular basis at planning group meetings. Health and safety plans for the coming year must form part of the annual Service health and safety report.

2.2 Annual Health and Safety Reports

Services will prepare an annual health and safety report that evaluates their health, safety and wellbeing performance for the previous year. Such reports should include information on the following issues:

- A brief profile of the Service and its main functions and undertakings.
- 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.
- Risk management, planning and progress including percentage of risk assessments reviewed.
- Number of employees attending IOSH accredited health and safety training courses.
- Number and type of service specific health and safety training courses undertaken.
- Percentage of total number of establishments carrying out joint management/trade union health and safety inspections and percentage of satisfactory remedial actions completed.
- Service accident/incident statistics and identified causes for lost time.
- Issues identified by BS OHSAS 18001; 2007 audits and recommendations completed.
- A brief outline of the results of any internal health and safety audits and, where appropriate, recommendations completed.
- Service Health and Safety objectives for the coming year.

Services' annual reports must be submitted to the FAR Health and Safety Section in advance of submitting them to the appropriate Council Boards.

Guidance on preparing an annual health and safety report is available from the Health and Safety Section and on the Council's intranet site.

2.3 Health and Safety Planning Groups

The Director and nominated Head of Service requires to retain, at Service level, a health and safety planning group to assist in the formulation and implementation of the service health and safety policy and plan. Planning for health and safety is also suitable for inclusion as a standing agenda item within the remit of senior management team meetings.

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

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

For further clarification on Health and Safety planning groups refer to the current Corporate Health and Safety Plan.

2.4 Significant Risks

The Council recognise that Service health and safety planning groups require to implement an effective risk control strategy to minimise employees and service users' exposure to significant risks. Detailed below is a list of risks (not in order of priority and not exhaustive) that, by the very nature of service provision, may be encountered:

- Musculoskeletal disorders
- Slips, Trips and Falls
- Working at heights
- Traffic management
- Lone working
- Hand Arm Vibration
- Occupational driving
- Violence and aggression (including acts relating to a physical or psychological conditions)
- Contractors working on Council premises
- Work related stress (this can be influenced by non work related stress)
- Council managed public events

Services must identify all significant service related health and safety risks in addition to those listed above.

2.5 Emergency Procedures

The following issues should also be given due consideration by Service health and safety planning groups as part of their ongoing management of health and safety.

- a) Fire Safety and emergency evacuation procedures
- b) First Aid provision
- c) Security measures
- d) Welfare arrangements

For further guidance contact the FAR, HR and OD, Health and Safety Section or the Civil Contingencies Service.

3.0 Active Monitoring

3.1 Audits

An audit is a systematic examination of the health and safety management systems in place, including implementation of policies, procedures, training and safety awareness of staff.

The Health and Safety Section will actively monitor the implementation of the Council's Health and Safety Policy and Plan. This will be achieved by auditing the health and safety management systems within Services over a 3 year period, relevant to their risk profile, and on a timescale agreed with their respective health and safety planning groups.

The Council is externally audited to ensure our standards meet those required to retain accreditation to BS OHSAS 18001: 2007. A corporate wide sampling plan is compiled every 3 years. All Services will be audited on a rolling programme relevant to their risk profile.

3.2 Inspections

A safety inspection is the physical examination of the workplace including tools and equipment.

Safety inspections, preferably joint management and union safety representative's inspections shall be undertaken within all Services as part of their service health and safety plan and to support the audit programme.

A corporate wide health and safety inspection programme has been developed over a rolling 3 year period. All premises within the Services have been assigned a risk rating. This will determine the inspection frequency undertaken by the health and safety section.

To ensure health and safety standards are maintained, Services should have arrangements in place to undertake inspections of their premises, on an annual basis, utilising the Workplace Observation Inspection Report (WOIR) inspection template which can be found within intranet or from the FAR Health and Safety Section.

4.0 Re-active monitoring

4.1 Accident and Incident Analysis

Accidents and incidents at the following levels of severity will be analysed by service management, FAR health and safety section, service planning groups, safety groups and safety committees involving employee representation, with a view to determining and where possible eliminating the causes of:

- Major injury/dangerous occurrence;
- Lost time accidents of 7 days or more; and

- Work related ill health and diseases.

4.2 Accident Investigation and Reporting Investigation

Every accident, incident or near miss must be investigated by the injured person's supervisor or line manager to the degree required to prevent a recurrence. A report completed on the Accident Incident Reporting Database (AIRD) shall contain outlined recommendations to prevent a recurrence; however, further investigation may be carried out by the FAR Health and Safety Section.

Guidance on accident and incident (including violence) reporting procedures is available on the intranet. Further advice can be obtained from the FAR Health and Safety Section as required.

4.3 Reporting of Incidents, Diseases and Dangerous Occurrences Regulations (RIDDOR) 2013

Every employee who suffers personal injury at work must give notice to their supervisor of any accidents or incident, as soon thereafter as is practicable. The injured employee must ensure that details of the incident are entered on the AIRD system or in line with Service's local procedures. The FAR Health and Safety Section will be responsible for reporting any relevant incidents to the Health and Safety Executive (HSE) under RIDDOR.

5.0 Statutory Compliance of Domestic and Non-Domestic Properties

Services that manage and maintain domestic and non-domestic properties, are the first point of contact in providing advice and guidance, prior to any works carried out for individual property users and services. They must ensure, so far as is reasonably practicable, that statutory compliance is met in accordance with Corporate Guidance and appropriate records are available for inspection. Relevant guidance is available on the intranet. Further advice can be obtained from the FAR Health and Safety Section as required.

6.0 Contractors

When appointing a contractor the health and safety risks should be considered. Services should follow corporate guidance. Further advice can be obtained from the FAR Health and Safety Section as required.

All contractors shall be assessed in terms of health and safety at procurement stages by the employing service. Only contractors who can demonstrate their ability to meet the standards set by the Council will be employed.

The undertakings of any contractor should be monitored to ensure that any risks presented to employees, members of the public, service users or visitors are minimised.

Commissioning officers must monitor contractor's activities throughout the duration of the contract, heavily scrutinising areas of high risk. Any contractor's activities that cause Health and Safety concerns may require the commissioning officer's intervention although immediate action may be necessary by the responsible person for the premises. Works should be discussed with the responsible person for premises.

7.0 Supplementary Policies and Guidance

This Health and Safety Policy is supplemented by specific policies and related guidance, such as Accident and Incident Reporting, Risk Assessments, Statutory Inspection and Maintenance, Asbestos, Legionella, Stress as well as additional health, safety and wellbeing topics.

All supplementary corporate health and safety policies and guidance are available on the intranet. Further advice can be obtained from the FAR Health and Safety Section as required.

8.0 Policy Review

The Health and Safety Section shall monitor this policy for its effectiveness.

This policy and accompanying documentation contained within will be reviewed and where necessary revised on a three yearly cycle, unless an earlier revision is prompted by significant changes in legislation, procedures or best practice.

Any changes or amendments to this policy will be done in consultation with the trade unions and employees where appropriate.

This policy and any revision of it will be drawn to the attention of every employee of the Council.