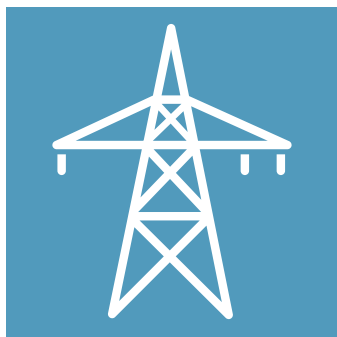# Guidance for the Management of Health and Safety Performance

Supporting and Empowering Middle Level Managers in the Electricity Industry

issa | INTERNATIONAL SOCIAL SECURITY ASSOCIATION

Section for Electricity
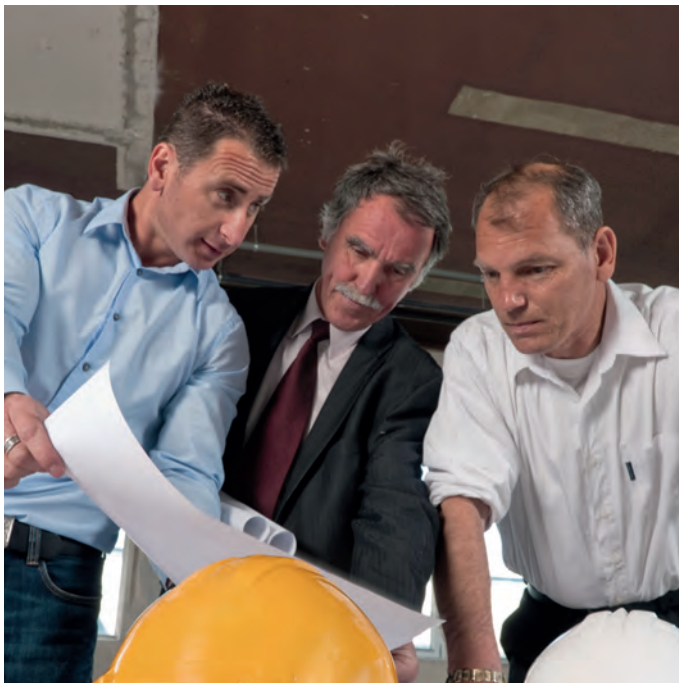
Guidance for the Management of Health and Safety Performance

Supporting and Empowering Middle Level Managers in the Electricity Industry

List of contents

ANNEXES

Preliminary Remark

The starting point of this guidance is an assumption that companies in the electricity industry have appropriate systems and procedures in place to manage their duties with respect to health and safety commensurate with the inherent risks. That means to have a company health and safety policy and procedures for Corporate Social Responsibility/Governance (e.g. ISO 26000) and to comply with the 'General Obligations on Employers' as outlined in Article 6 of the Council Directive on the Introduction of Measures to Encourage Improvements in the Safety and Health of Workers at Work (89/391/EEC).

Similarly companies should adhere to the principles of the ILO Promotional Framework for Occupational Safety and Health Convention 2006 (No.187), introduced to promote continuous improvement of occupational safety and health to prevent occupational injuries, diseases and deaths.

The level of detail required within the company safety management system will be dependent on the size and function of the organisation. Larger businesses will have more resources and will be expected to introduce more detailed procedures than for Small and Medium Sized Enterprises (SMEs). However, an appropriate level of commitment to Health & Safety (H&S) issues should still be evident.

Purpose of Guidance

The purpose is to empower and improve the human performance of middle level managers in health and safety management within the Electricity industry.

This document is aimed at assisting middle managers in their role by:

- Illustrating the key factors for managing health and safety, and how these align with other business processes and the overall management of the business;
- Outlining key health and safety policies and how to implement them;
- Providing support and practical advice in health and safety management to enable managers to lead their teams;
- Explaining how to cope with their responsibility for the workforce and the work to be done.

The guidance is intended primarily for middle level management in the Electricity Industry, but should also be referred to by senior management because of the potential impact of decisions that they make on middle management.

Definition of Middle Level Management (MLM)

Middle level management (MLM) includes managers, team leaders, section leaders, supervisors, trainers etc who are key focal points within companies and can represent the 'critical mass' to the success of the business.

Appointment of suitable persons

It is imperative in the first instance that suitable persons are appointed into such positions. This is achieved through the use of efficient Human Resource and personnel assessment procedures to ensure that only employees with the required skills, competence and experience are appointed as managers. The same criteria shall be applied to those appointed externally or promoted internally from within the organisation.

The manager's position within the organisation

```
                    ┌─────────────────────────┐
                    │   Senior Management      │
                    │        (SM)              │
                    └─────────────────────────┘

┌──────┐   ┌──────┐   ┌──────────────┐   ┌──────┐   ┌──────┐
│ MLM  │   │ MLM  │   │ Middle Level │   │ MLM  │   │ MLM  │
│      │   │      │   │ Manager (MLM)│   │      │   │      │
└──────┘   └──────┘   └──────────────┘   └──────┘   └──────┘

┌──────┐   ┌──────┐   ┌──────────────┐   ┌──────┐   ┌──────┐
│  E   │   │  E   │   │  Employees   │   │  E   │   │  E   │
│      │   │      │   │    (E)       │   │      │   │      │
└──────┘   └──────┘   └──────────────┘   └──────┘   └──────┘
```
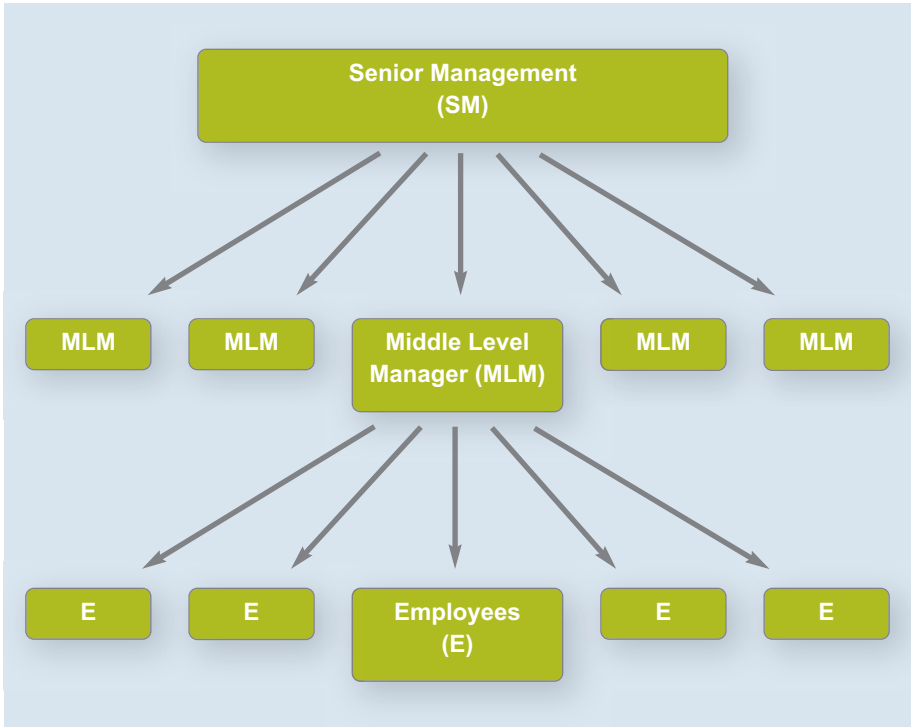
Diagram illustrates the manager's position and responsibility within the organisation.

PART ONE
General Duties for Companies, Directors, CEOs, Senior Managers

1.1 General

Organisations have clear duties to ensure the health, safety and welfare of their employees, members of the public and anyone else affected by their activities. Businesses must assess the risks to these groups from work activities, identify priorities and then introduce appropriate control measures and actions to mitigate those risks. This is usually achieved through a formalised health and safety policy by the board that is much more than a document; it should be an integral part of the organisation's culture, its values and performance standards.

This policy is then realised in practical terms via a health and safety management system that enables the planning, organisation, control, monitoring and review of control measures.

This is reinforced by establishing a stable health and safety culture. The overall aim should be to secure continuous and sustainable improvements in safety performance.

To achieve this balance between the required systems and behaviours requires suitable arrangements to be put in place that draw together the core elements of successful health and safety management. This often results in a Plan, Do, Check, Act approach to managing health and safety that promotes a cyclical process of continuous improvement. Organisations must:

- **Plan** through the introduction of appropriate policies and procedures;
- **Do** by identifying risks and implementing control measures;
- **Check** via monitoring and measuring performance and;
- **Act** by reviewing progress and introducing improvements.

This framework uses accepted good management principles and applies them in the context of health and safety management that helps promote the adoption and development of a best practice approach.

Reference: Managing for Health and Safety, HSG65, Health & Safety Executive, 2013
Reference: Leading Health and Safety at Work, INDG417, Health & Safety Executive, 2013

The economic benefits to a business of good health and safety management are well known. The company will benefit from reduced running costs and will be exposed to reduced levels of risk. It will result in fewer accidents leading to less compliance, regulatory and legal costs. Sickness absence rates are reduced and employee engagement often increases, whilst business standing and stake-holder reputation will also be enhanced.

There is data available to demonstrate that investments in risk assessment and hazard controls can be shown to provide a positive pay back both in terms of costs and employee welfare.

Reference: Calculating the International Return on Prevention for Companies: Costs and Benefits of Investments in Occupational Safety and Health, ISSA, 2013

These issues are reinforced by industry frameworks, for example ISSA Mining Section's Seven Golden Rules serve as a guideline for the systematic and sustainable improvement in that sector, the principles of which are equally applicable in the electricity industry. Businesses must demonstrate:

- Leadership and Commitment;
- Identify Hazards and Risks;
- Set Health & Safety Targets;
- Ensure a Safe System;
- Use Safe & Healthy Technology;
- Control and Improve the Qualifications and Knowledge of your Staff;
- Invest in and Motivate your Employees

Reference: Seven Golden Rules for Safe and Economical Mining, ISSA Mining Section

1.2 Effective Health and Safety Management

The basics outlined above will ensure that the management of occupational health and safety is accorded the necessary status within the overall business objectives and the company business plan. To ensure that the identified health and safety goals within the plan are realised, managers will need to be supported and empowered through the setting of standards.

Standards are required to address the areas of **Leadership** and **Risk Management**, which are important aspects of any organisation. These should be accompanied by standards covering **Policies and Procedures** and **Training and Competence**, which provides the means of achieving the required levels of health and safety performance, and all of this should be supported by a consistent and visible approach to **Involving the Workforce**.

Key aspects of Leading H&S Performance

Evidence of good practice includes the development of formal agreements within the business. These set out the standards and behaviours that are both expected and necessary for a cooperative approach between management and trade unions or representatives of employee safety.

The above will only be achieved through management and trade union and other workers' representatives working together to ensure that health and safety is seen as a key priority, and that the pervading culture empowers and supports staff to challenge unsafe acts and conditions.

At a working level workforce involvement can be promoted via health and safety committees, joint working on investigations and safety audits and the joint development and revision of safe systems of work.

Mangers may also need more specialist advice to meet the health and safety standards set by the business and the level of performance required. This may be provided by competent health and safety officers and medically trained staff as appropriate.

Once the correct environment has been established it is important that the gains that have been achieved are not then eroded over time by complacency or through a loss of corporate memory. Accurate records and learning the lessons from past incidents can assist in this process.

1.3 Leadership

Setting the right tone from the top is critical in establishing the expectations of the organisation with regard to health and safety. To demonstrate this management should be visible through regular visits to sites. Such visits should enable genuine two-way, effective communication across all levels of the organisation.

Senior management should be responsible for chairing the central health and safety committee, which will send a strong message to staff on its importance. Such motivational aspects are important for involving the workforce, but must be accompanied by clearly defined and documented responsibilities for both managers and employees alike so that everyone understands the role they can play in improving health and safety.

1.4 Risk Management

Having first established an effective leadership culture, there is a need to build a procedural framework that links leadership decisions to the day to day management of health and safety issues in the workplace, so that good business policy enables good working practices.

Independent research together with an understanding of potential risks within the electricity industry has identified a number of key areas that represent both good practice and are safety critical. These factors need to be addressed and require a continuous focus for success.

First and foremost **Senior Management Commitment** must be evident. In turn this commitment must be supported by clear **Roles and Responsibilities** and **Effective Procedures** must be in place in order to help the organisation achieve its stated health and safety aims and objectives. This will only be realised by having a **Competent and Trained Workforce** that is provided with **Adequate Resources** in terms of equipment and support. **Effective Communications** between all parties is essential and this will include **Contractor Staff** that are employed and managed by the company.

Reference: Investigation of Human Factors Safety Issues within ENA, Health & Safety Laboratory, 2009

The process should begin by recognising the link between leadership decisions and their impact on health and safety in the working environment. All of these principles are also equally applicable to employees and contractor and subcontractor supply chain staff.

There should be systems in place for the identification of all risks, robust assessment of the risks together with the application and monitoring of appropriate controls.

There should be effective management of situations of non-compliance.

All near misses should be investigated in a timely manner.

An effective culture should be fostered which encourages open reporting of near misses in addition to actual accidents and incidents.

Managers should have an understanding of the realities of a particular task i.e. any potential conflict between health and safety and operational considerations.

Root causes of all accidents should be clearly and accurately identified and communicated.

Key factors for effective H&S Organisation

1.5 Training & Competence

1.5.1 Competency guidelines

Managers need to demonstrate competence across a broad range of disciplines covering technical, financial, operational, business and people management skills as well as occupational health and safety management. The precise mix of competencies required for individual projects and activities will depend on the particular context and circumstances. However, developing and assuring the competence of staff is an essential precursor to delivering improved business performance.

It is therefore important that appropriate training, guidance and routes of support are available to middle managers to equip them in their role. This is because they are responsible for implementing the operational and management practices and procedures that stem from overall company policy.

There should be a commitment to the timely delivery of all training to avoid skill or competency gaps.

Competence in health and safety means managers need to posses the qualifications, knowledge, experience and qualities appropriate to their duties. Managers need to be clear about what is expected of them, to receive appropriate training and development, to have good experience of their field and seek to maintain or improve their competence over time.

A set of competency guidelines for managers, supervisors and the operational staff they are responsible for will help ensure that adequate arrangements are in place and identify any gaps in knowledge, skills and competence.

Skills & Competency Framework – Key Principles			
Competency	What you must do	What you must understand and know	What evidence of competence you need to demonstrate
General require-ments	Develop basic level of SHE Awareness Be familiar with company H&S policies Engage in company induction programme Ensure all timely delivery of this process to all staff/team	The key aspects and requirements of H&S legislation The key business functions of your company and their interdependencies An understanding of the impact of your team's actions on all stakeholders – other employees, customers and members of the public	Ensure timely achieve-ment of all internal company training requirements External professional H&S and managerial qualifications where appropriate
Operational Specific	Enrol on and progress through company training programme (operational and technical modules) Develop specific technical or managerial skills dependent on role, for example:	Knowledge of ap-plicable standards and approved industry practices Detailed under-standing and ability to work to company proce-dures and safe systems of work	Ensure regular work based tasks across your skill set are com-pleted to reinforce practical and desk top learning Maintain up to date technical knowledge and awareness of new techniques, technol-ogy and equipment

Skills & Competency Framework – Key Principles for Middle Managers (Some examples included for illustration). The table will be continued on page 18/19.

Competency	What you must do	What you must understand and know	What evidence of competence you need to demonstrate
Operational Specific	■ Fitter, jointer, linesman; ■ Logistics manager; ■ Training manager; ■ Auditor etc	Ability to oversee and assess the performance of staff performing operational or managerial tasks	Carry out routine validation tests on the work of your team
Safety & Emergency	Ensure compliance with all procedures and safe systems of work, taking corrective action where necessary Maintain up to date risk assessment processes are employed Play a key role in the company's H&S Committee to aid continuous improvement in H&S performance Ensure staff are trained to deal with routine and non-routine situations; use of emergency tests and drills	Familiarity with all aspects of the company health and safety management system as it applies to you and your team Working knowledge of the specific hazards and risks in a variety of site environments and the correct safety practices that need to be employed Familiarity with, and the ability to carry out, both proactive safety monitoring and reactive incident investigations	Ensure you continue to meet the for the competency specifications associated with your grade and role (Competent Person, Authorised Person, Middle Manager etc) Training in monitoring and auditing of company safety management systems Maintain knowledge from refresher H&S training, and extend your experience where possible from external engagement (other industries, professional bodies, H&S regulators etc)

Competency	What you must do	What you must understand and know	What evidence of competence you need to demonstrate
Training & Develop-ment	Introduce and maintain training programmes and profiles for your staff Ensure regular refresher training is carried out, particularly when new procedures and equipment are introduced Ensure company behavioural and cultural pro-grammes are rolled out and reflected in the work of your team	The principles and benefits of good workforce engage-ment The importance and contribution to the overall busi-ness aims and ob-jectives from the work of your team The need to maintain accurate records and documentation to ensure adequate control, and the importance of corporate memory to ensure this learning is retained	Ability to carry out both formal and infor-mal reviews of your staff and their work, recognising both the extent and limitation of your responsibilities Good leadership and communication skills aided by your own training and feedback and advice from senior managers

Competence also involves more than technical training; a positive attitude and behaviour is also required to ensure health and safety remains a priority for all. Managers will need to keep abreast of statutory provisions and associated codes of practice and guidance, relevant advances in technology, and maintain awareness of current developments in their field that could impact on or require changes to changes to processes and systems.

Similarly managers should refer to and duplicate examples of good practice and procedures from other parts of the organisation where appropriate. This can be from both existing practices and examples of past learning. This will assist in the promotion and retention of corporate memory and the benefits this provides for the business.

These issues emphasise the importance of a commitment to ongoing training of employees and an ongoing programme of competence assessment and professional development. This needs to be supported and reinforced by regular refresher training at appropriate intervals.

1.5.2 Training

Managers should be trained to appropriate levels in both health and safety management and specific issues relevant to the electricity industry. Training should include aspects relating to process and personal safety and should include instruction and assessment for both routine and emergency situations. This needs to be complemented by refresher training on a regular basis commensurate with the level of responsibility and requirements of the role.

A mature health and safety culture will also provide the opportunity for joint training of managers with health and safety representatives to ensure that training is consistent across the organisation and meets the needs of all employees. A collaborative approach to work by the companies and the unions is more likely to lead to a successful resolution of health and safety issues facing the business. This is achieved through a shared understanding and by all parties working positively together. Joint training should address specific issues that are relevant to both the electricity industry in general and the individual company in question.

The overall aim should be to secure sustainable improvements in health and safety culture and behaviour leading to enhanced safety performance.

Issues to be covered in such training include:

- Lessons learned from incidents in the industry;
- Specific issues of asset management and process safety, new technology and procedures, occupational health and human and organisational factors;
- Legal duties;
- Consultation arrangements;
- Policies and procedures, risk assessments and safe systems of work.

In addition to health and safety training, managers should be trained in softer communication skills such as how to engage effectively with staff. This will help managers to be more effective in meetings and team briefings and assist them in developing their influencing and negotiation skills.

Managers must also ensure that vulnerable staff are properly trained, including new employees, those transferred to a new role, temporary workers and those with existing health conditions.

1.5.3 Contractors

Similarly there should be a commitment to preserve the health, safety and well-being of contractors and other stakeholders employed or affected by the business. This may include formal assessment and authorisation processes, but will certainly require effective supervision and communication with the contractors whilst on company premises and throughout the course of the contract.

Managers therefore need to be familiar with the procedures for managing contractors within their area of work, especially if they are employed for higher risk activities. Managers must also be aware of any impact on the health, safety and welfare of their own staff arising from the contractor's work.

1.5.4 External guidance and advice

Guidance and advice may be available not only from companies but industry or trade bodies that represent and work on behalf of the industry or from national skills and qualifications bodies; the latter may be established to provide a national framework of competencies, training and assessment standards in order to provide a consistent approach across the sector. This also provides a platform for dialogue between the training providers (academic institutions and training organisations) and the companies.

1.6 Policies and Procedures

1.6.1 Framework of Safety Rules

These issues can be addressed through the design and introduction of a framework of safety rules that will provide for the effective management of risks in the industry. They form the foundation of the overarching safety management system and enable safe systems of work to be introduced for people working on or near electrical assets.

A set of generic safety rules also ensures that the necessary management controls are in place and are subject to continuous improvement. They ensure that formal, approved procedures are introduced following suitable and sufficient risk assessments of the organisation's activities and are carried out by managers in conjunction with the workforce. They provide a common framework for the cooperation, communication and control of staff and contractors, and provide operational guidance so that everyone can work safely and reduce the risk of injury to themselves and colleagues. Due to variations in work environments and the possibility of unforeseen hazards and events, these procedures must be validated by managers in a field operational setting to ensure they are robust and sufficient in all circumstances. They allow best practicable safety standards to be referenced, understood and shared throughout the industry and help highlight where additional resource or training is required.

1.6.2 Risk Assessment

As a minimum these core workplace risk assessments should address the following:

- Identify the hazards;
- Decide who might be harmed and how;
- Evaluate the risks and decide on precautions;
- Record the significant findings;
- Review the assessment and update if necessary.

Reference: INDG 163, 'Risk Assessment, A brief Guide to Controlling the Risks in the Workplace', HSE, 2014

This approach to risk management can be further enhanced by reference to wider resources and learning opportunities. Fulfilment of both legal duties and

practices that extend beyond legal compliance can be achieved by taking account of guidance issued by Government and regulatory bodies.

Assistance may also be provided by industry or trade bodies that represent and work on behalf of the industry, and which are well placed to draw on common learning across member company businesses that are often dealing with and addressing the same issues. It is clear that these principles should also be adopted and reflected in the actions of middle managers.

Similarly, clear and defined benchmarking across either related sectors may provide opportunities for the sharing of best practice leading to new ways of working on common safety issues.

1.6.3   An integrated approach

Health and safety is an integral part of an electricity company's business, and leading performance and practice in health and safety management will serve the overall performance of the company. The organisation of the business requires an integrated approach to financial management, quality, environment, sustainability, stakeholder needs and health and safety issues. For example, equipment procurement should not be carried out in isolation from other business functions; it is important that management policies ensure that equipment is not purchased purely on cost which could then give rise to safety and health risks such as manual handling, noise and vibration issues etc.

Increasingly companies are also required to report on their performance to owners, investors, regulators, government and the general public on these issues, all of whom as stakeholders require increasing levels of transparency and accountability on the health of the business.

1.6.4   Management systems

This is achieved in part through the introduction and use of management systems for quality (ISO 9001:2008), environmental (ISO 14001) and health and safety (ISO 18001:2007) aspects, which help ensure that the company complies with and maintains agreed standards of performance. Further control is achieved through recognition and observance of international standards requirements (ISO, CEN, and CENELEC). These standards are subject to continuous review and organisations must maintain sight of new developments in this field, such as the proposed International Standard for Occupational Heath and Safety Management Systems, ISO 45001. Additional control is achieved through the use of

company specific standards and recognised industry good practice, and the level of compliance is then usually determined through a programme of auditing and reporting.

1.7 Involving the workforce

Guidance is required on the practical tools and support mechanisms that are available to improve the effectiveness of health and safety management decisions, including actions by those key staff who are designated as 'middle managers' to ensure the effective use of resources and full engagement of all employees.

The roles and responsibilities of managers should be clearly defined with regard to health and safety and should be clearly communicated to the whole workforce. This should be accompanied by positive, consistent and regular engagement with employees in key aspects of health and safety. The workforce should also be engaged in the promotion and achievement of safe and healthy conditions.

An open culture of empowering employees should be fostered to encourage a shared approach to resolving issues. This process will be assisted by the involvement of workers' representatives in the organisation's health and safety committee and this will help ensure consultative decision making takes place.

Employees at all levels should be empowered to challenge unsafe acts and conditions as part of the overall safety culture of the organisation. The provision of high quality training is necessary to similarly empower workers so that they can actively contribute to the management of health and safety risks. Collectively this should lead to an inclusive environment where al opinions are valued, thereby ensuring that workforce engagement is then sustained over time.

PART TWO
Practical Advice for Middle Managers

2.1 Introduction

Middle Managers are responsible for managing the work of a body of employees and this will include important responsibilities for their health, safety and welfare whilst at work.

They are therefore required to operate within a two way chain of command. They will report upwards to senior managers on the operational performance within their sphere of influence, which will be based on the effectiveness of the assets under their control. Such assets include both the hardware equipment and the employees who are under their direct control. They are also required to manage and oversee the workload of these employees for whom they have direct management responsibility, whilst all the time ensuring their safety and wellbeing.

A manager's role needs to balance all of the above priorities to ensure overall effective performance. Managers will be expected to deal with these conflicting demands, not through prioritising one area above another but through assigning equal importance and time to achieve the overall goals of the business.

Managers also need to take account of the direct and indirect costs of risk controls that are introduced, and the costs that will then be avoided in the long term. This process must take account of the lifecycle of the equipment or process that is introduced, from the design stage through procurement, installation, operation, maintenance and finally decommissioning.

One of the roles of the middle manager is to drive improvements in health and safety performance within their team, with the resulting impact that this will have on the organisation as a whole. It is therefore imperative that these managers are first appointed clear responsibility for health and safety, and the issue accorded appropriate status both within the organisation and their individual role. They should receive appropriate support from competent health and safety professionals, including health and safety officers and medically trained staff.

Whilst the Senior Manger retains overall responsibility for health and safety within his sphere of influence, he may delegate specific responsibility for certain functions to the middle manager who then becomes accountable for ensuring

that these duties are performed. The middle manager may then himself delegate tasks to members of his team whilst again retaining overall responsibility for the actions of all employees under his control.

So they have to first be authorised by SM to take a specific responsibility clearly defined as shown below.
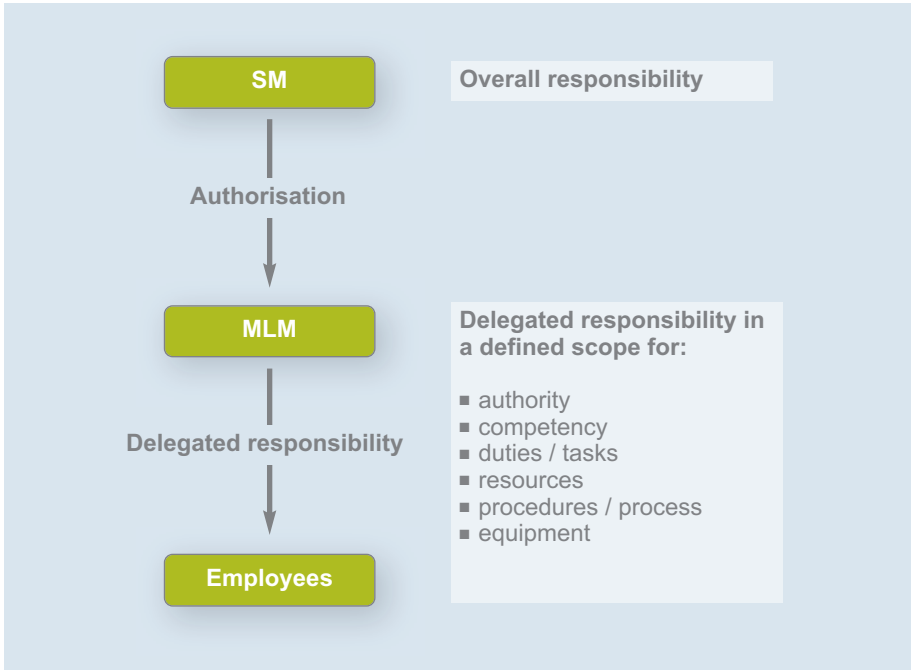
Delegation and responsibility

This authorisation should be formalised to help set out the expectations on the middle manager and to help him understand the extent and degree of responsibility that he has been given. An example of an agreement between the senior manager and the middle manager is provided by an annex (*"Example – Delegation of Senior Manager's duties", Annex 1*).

The status and responsibilities of middle managers within the organisation and the appropriate behaviours needed to meet the required level of health and safety performance *("Guide – Awareness of roles & responsibilities", Annex 2)*

There are in principle two kinds of methods to comply with their responsibility for the health, safety and welfare for the body of employees whilst at work:

- Leadership
- Health and Safety Management
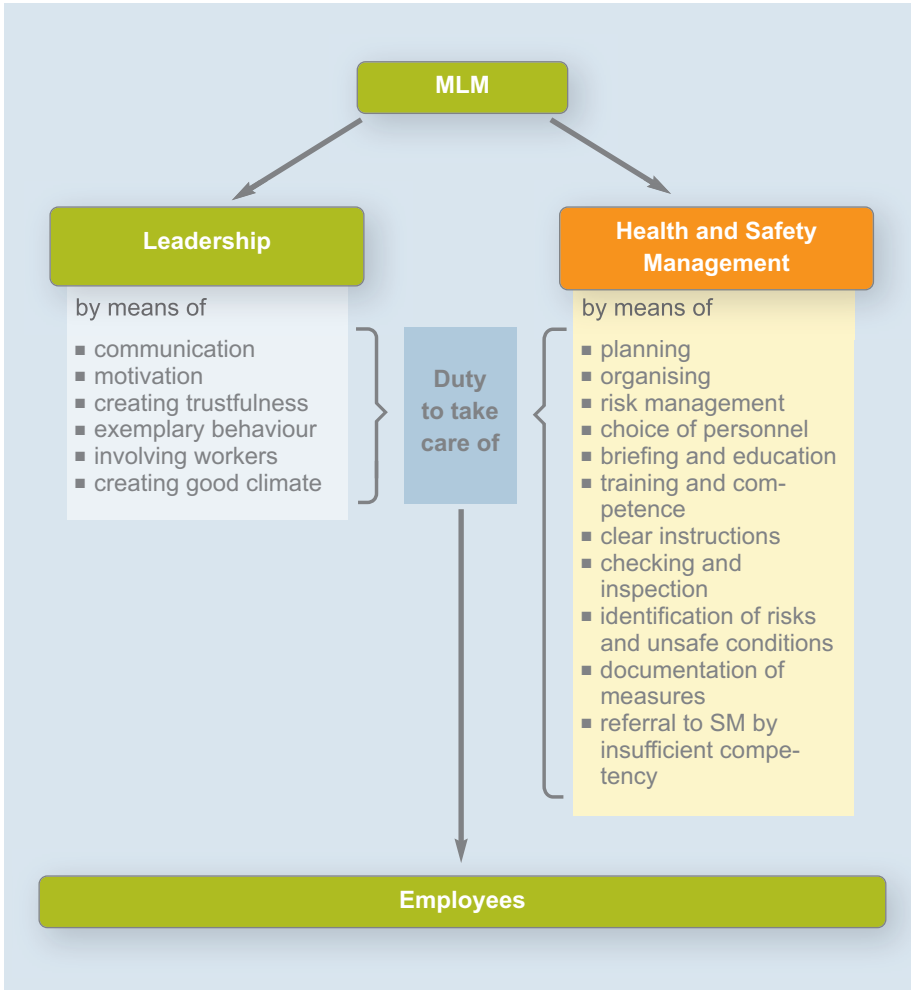
Responsibility means duty to take care of the employees

2.2 Leadership

2.2.1 Effective Behaviour

An effective manager will be able to motivate and energise their team to move beyond legal compliance and establish a culture of learning and good practice that can be replicated within the business (*"H&S Leadership", Annex 3*). Leaders will get the culture they deserve based on their behaviours, and as leadership is at the heart of any system it is important to set the right tone at the outset. This is even more important when considering that health and safety incidents and failures are often rooted in failures of leadership.

Managers need to lead by example and provide a clear sense of direction as to what is required. Performance is managed through the setting of clear objectives and targets and the resources that are required to achieve this need to be identified. Regular and proactive engagement with the team provides transparency on key safety issues, and provides for an open environment and relationship that is built on mutual trust.

In turn this enables performance to be related to the requirements of the safety management system and the overall objectives of the business.

Managers need to lead by example and demonstrate a commitment to health and safety matters, should aim to motivate and inspire others, and by doing so help ensure that safety remains a key business priority.

2.2.2 Involving the Workforce

Managers need to work with their teams to raise awareness of the importance of good health and safety practice, and to ensure that all employees are aware of how their behaviour can impact on the overall performance of the company (*"Guide – Workforce Engagement", Annex 4)*. Managers need to develop mature relationships with staff as a platform for continuous improvement. Establishing a constructive dialogue will lead to a shared understanding of responsibilities on both sides. The development of a durable commitment to health and safety between all parties will allow the organisation to progress beyond legal compliance and become a learning and progressive organisation, and establishing a just culture within the business will then result in an increased level of trust and cooperation.

In practice managers need to ensure that information is shared, that effective consultation takes place, and that a culture of negotiation and collaboration is promoted. Information on health and safety needs to be clear and concise, consultation helps everyone prepare for necessary change, negotiation builds trust and respect, and collaboration will lead to shared aims and a sense of ownership. Within this cooperative framework a manager must be exemplary in his own behaviour whilst retaining the authority to make decisions and challenge unsafe acts, including the use of disciplinary measures where necessary.

Managers need to create and maintain positive working relationships with their workforce through regular and engagement and communication. This will ensure an open culture of co-operation and collaboration on health and safety issues.

2.3 Health and Safety Management

2.3.1 Planning and Organising

Safe work performance starts with the thorough planning and organising of every work concerning long-term projects as well as the daily work activities. Insufficient preparation may lead to unsuitable improvisation and so to risks and even hazards.

Each task needs the appropriate choice of staff and equipment. The employees must be competent and well trained regarding the work to be done.

The equipment must be appropriate and well maintained.

The task and the safety measures need a clear briefing by the MLM. He has to check the understanding of the staff.

2.3.2 Risk Management

Risks and unsafe conditions are identified.

The risks related to concrete work situations and a recognized threat have to be evaluated (Risk Assessment) and must be under control.

There should be an effective management of situations of non-compliance.

All near misses should be investigated in a timely manner.

Risk management improves health and safety performance and reduces levels of risk that workers are exposed to. It demonstrates a consistent and thorough approach using the relevant standards and controls *("Guide – Risk Management", Annex 5)*.

If measures are beyond the competency of MLM referral to SM is necessary.

Risk management is delivered through an effective programme of risk assessment to ensure that all risks to employees are identified, eliminated or minimised by the introduction of appropriate controls.

A policy of zero harm seeks to prevent all incidents and accidents. When incidents and near misses do occur it is important to investigate the immediate and root causes to learn lessons and help prevent any reoccurrence *("Guide – Incident investigation and management", Annex 6)*.

Regular monitoring of health and safety management systems and the operational procedures and controls in place is essential to ensure that any deficiencies are identified and corrective actions taken *("Guide – Auditing", Annex 7)*.

2.3.3 Training and Competence

Continued development, education and training of staff ensures that competency levels are maintained to support continued H&S performance *("Guide – Training & Competence", Annex 8)*.

Training needs are analysed and regular training is scheduled.

Measures are documented.

Ensuring that employees have the required levels of skills, knowledge and competence for their roles is demonstrated by a commitment to a continuous programme of training so that a high level of health and safety performance is maintained.

2.4 Contractors

The effective management of contractors can be aided by ensuring that the following requirements are in place prior to commencement of any work:

- Conduct due diligence on the company via a central procurement function;
- Assess the training and competence of each individual's background and previous experience/qualifications/authorisations via their training record;
- Assessment of contractor's previous work;
- Arrangements to manage the contract and monitor standards of work on site;
- Provision of job specific risk assessments and safe systems of work.

Once on site managers will be responsible for ensuring that an initial health and safety induction is carried out.

Appropriate supervision arrangements will need to be in place in order to maintain effective communication and co-operation during the course of the contract, and this will be true for both contractors and any sub-contractors that are employed.

Managers must ensure regular monitoring of the contractors and their work is undertaken to ensure health and safety standards and working practice are maintained.

Any incidents or accidents must be reported, investigated and remedial actions taken.

Records must be kept of induction, permit to work and any training that is undertaken.

Arrangements must include procedures for managing any emergency situations.

Managers may need to be involved in the client/contractor review process to ensure that future contracts benefit from any identified improvements.

Annex 1: Example – Delegation of Senior Manager's Duties

Delegation of duties for managing health and safety to middle managers

Dear Ms/Mr _____

We hereby transfer to you the management of duties arising from legislation, regulations and rules with respect to occupational safety and health protection of the workforce.

You shall ensure compliance with law, regulation and rules with respect to health and safety protection in your field of responsibility. Necessary financial and personnel resources will be provided. If unscheduled measures outside of your competence are required then you will need to consult the available competent advisers and services. In the event of any urgency you shall contact your supervisor in the first instance.

The main issue that remains unchangeable is your responsibility for ensuring the safety and health of the workforce under your direct authority. The duty is inextricably connected with your status and role as a leader.

You have to ensure the health and safety and welfare of all personnel under your authority and carry out appropriate safety measures within your level of competence and training.

Notably you have to:

1* Supervise and control compliance with legal safety regulations and obligations;
2* Supervise internal regulations with respect to occupational safety and health protection;
3* Instruct employees regularly on safety matters and teach them the task requirements of a new task;

4* Inform, supervise and ensure that employees use personal protective equipment that is provided;

5* Supervise and control workplaces;

6* Report hazards and damage to employees' health;

7* Adopt temporary safety schemes in response to imminent hazards and risks;

8* Co-operate with safety experts, medical advisers and works council colleagues and seek their advice where appropriate.

Responsibility for occupational health and safety issues also means that non-compliance with law and safety regulations may lead to claims for indemnification, a fine or civil penalties being imposed upon the company.

If you do not carry out the tasks within your responsibility or if you fail to adhere to company policies and procedures then this may be recognised as failure to adopt suitable measures and you may be held accountable. This also applies to any failure to carry out instructions or to ensure the adequate training of personnel.

Responsibility for the senior management official and the employer are unaffected by this delegation of responsibility.

_____

place; date

_____

duty holder – first name, surname

_____

senior management official – first name, surname

Annex 2: Guide – Awareness of roles & responsibilities

Definition

Fully aware of their role within the company structure and their specific responsibilities in ensuring successful H&S performance as well as those of their staff.

Key behaviours/traits

- Ability to undertake H&S responsibilities and carry out activities in support of the company's H&S goals on a regular basis to an agreed standard.
- Able to communicate effectively with all levels of workers within the company.
- Fully trained and competent.
- Recognises their own continuing responsibilities and those of their team.
- Knows when to seek expert advice and support.

Outputs

- Regular reports to management on H&S performance.
- Regular updates to management on H&S law relating to key risks.
- Identifies training and development needs as part of annual appraisals.

Performance Indicators

- Demonstrates appropriate behaviours on a consistent basis.
- Roles and responsibilities are regularly reviewed to ensure effectiveness.
- Appropriate staff are selected for specific tasks.

Measurement

A blend of qualitative and quantitative measures of the above.

- **5** exceptional
- **4** exceeds requirements
- **3** meets requirements
- **2** below requirements
- **1** unsatisfactory

Annex 3: Guide – H&S Leadership

Definition

Motivating and inspiring others to go beyond mere compliance with H&S procedures. Provides a clear sense of direction, helping others to perform to their full potential. Leads by example.

Key Behaviours/traits

- Creates an inclusive environment where all opinions are valued.
- Passionate and enthusiastic about maintaining excellence.
- Energises teams to move beyond compliance and effectively utilise systems for sharing good practice and learning from incidents.
- Leads by example and never walks past unsafe acts or conditions without addressing them.
- Provides adequate resources to ensure health and safety issues are identified, analysed and prioritised to drive improvement.
- Positive and proactive delivery and reinforcement of safety messages direct to staff
- Receptive to input from others, ensuring action is taken to get things done and that solutions are implemented.
- Able to communicate and engage with staff at all levels.

Outputs

- Sets H&S priorities for engagement that are reflected in relevant management targets.
- Empowers staff to "own" H&S issues.
- Creates an open culture and shared approach to solving issues.
- Recognises and celebrates achievement.
- Disciplines violations from procedures in a proportionate and educative manner.

Performance indicators

- Demonstrates appropriate behaviours on a consistent basis.
- Regular engagement with team on proactive management of key safety issues.
- Resolution of local issues/disputes on a timely and consistent basis.
- Sets appropriate plans for self and team members.
- Fewer issues raised by workers' representatives at company's H&S committees.
- Actively involved in investigations of accidents and incidences of safety and ill health.
- Actively involved in the work of H&S committees;
- Fosters an effective culture which encourages open reporting of near misses in addition to actual accidents and incidents.

Measurement

A blend of qualitative and quantitative measures of the above.

- **5** exceptional
- **4** exceeds requirements
- **3** meets requirements
- **2** below requirements
- **1** unsatisfactory

Annex 4: Guide – Workforce Engagement

Definition

Positive and regular engagement with workers at all levels regarding the key aspects of H&S management. Effective two way communication to ensure genuine buy in to ensure that H&S targets are met and all H&S issues are adequately dealt with.

Key behaviours/traits

- Positive and proactive communication of safety messages by managers directly to their teams;
- Receptive to input from others to help ensure action is taken to address issues/concerns raised.
- Active listener to create inclusive environment encouraging genuine input from staff.
- Encourages engagement by formal and informal means.

Outputs

- Generates an open culture and shared approach to resolving issues amongst workers at all levels.
- Recognition and celebration of achievement.
- Any disciplinary action for violations is applied in a proportionate way.

Performance Indicators

- Demonstrates appropriate behaviours on a consistent basis.
- Regular engagement with team and other workers regarding the proactive management of H&S issues.
- Resolution of issues in a fair way and on a timely basis.
- A reduction in number of H&S matters raised through formal channels.
- Exemplary performance is recognised and rewarded.

Measurement

A blend of qualitative and quantitative measures of the above.

5 exceptional
4 exceeds requirements
3 meets requirements
2 below requirements
1 unsatisfactory

Annex 5: Guide – Risk Management

Definition

Improves health and safety performance and reduces levels of risk that workers are exposed to. Demonstrates a consistent and thorough approach using the relevant standards and controls.

Key behaviours/traits

- Proactive reinforcement and reminders of the requirement to risk assess work activities and situations.
- Identifies risks that workers and others may be exposed to in areas of their responsibility and/or control.
- Ensures that robust risk assessments are carried out consistently.
- Applies appropriate and proportionate controls.
- Effectively manages situations of non-compliance.

Outputs

- Risks are effectively and consistently identified, assessed and controlled.
- Workers understand the need and reasons for carrying out risk assessments.
- All incidents and near misses are effectively investigated and the relevant risk assessments reviewed as necessary based on the findings.

Performance Indicators

- Demonstrates appropriate behaviours on a consistent basis.
- Regular engagement with staff to discuss and improve the risk assessment process.
- Risk assessments are reviewed at appropriate intervals and amended as necessary.
- All staff are appropriately trained in carrying out risk assessments.

Measurement

A blend of qualitative and quantitative measures of the above.

5 exceptional
4 exceeds requirements
3 meets requirements
2 below requirements
1 unsatisfactory

Annex 6: Guide – Incident investigation and management

Definition

Consistent and through approach demonstrating full understanding and application of the approved company procedures.

Key behaviours/traits

- Ensures appropriate priority is given to investigations.
- Demonstrates sound unbiased judgement.
- Supports thorough and rigorous investigations by staff.
- Ensures lessons learned from investigations are communicated as appropriate and feed back into the risk assessment process.

Outputs

- All accidents, incidents and near misses are reported in appropriate detail in a timely manner.
- All subsequent investigations are robust and carried out in a timely manner with the root causes accurately identified.
- All lessons learned and recommendations from investigations are communicated and implemented in a timely manner.

Performance Indicators

- Demonstrates appropriate behaviours on a consistent basis.
- Investigations are initiated on time (as specified in the company procedures).
- Root causes are identified and addressed to reduce future risk.
- Follow up actions are effectively monitored.
- The completed investigation reports are to a high standard.

Measurement

A blend of qualitative and quantitative measures of the above.

5 exceptional
4 exceeds requirements
3 meets requirements
2 below requirements
1 unsatisfactory

Annex 7: Guide – Auditing

Definition

Formally reviews on a regular basis the systems and procedures in place to ensure effective H&S performance.

Key behaviours/traits

- Able to make effective judgement about the adequacy of H&S performance and the procedures in place to deliver it.
- Recognises when there is a need to utilise expert advice and support.
- Communicates findings to senior management and workforce.

Outputs

- Formal H&S audits are carried out and concluded according to company policy.
- Learning from audits is widely disseminated.
- Audit findings are used to improve proactive and reactive indicators.

Performance indicators

- Demonstrates appropriate behaviours on a consistent basis.
- Audits completed to time.
- Audit reports are prepared to a high standard with recommendations clear and concise.

Measurement

A blend of qualitative and quantitative measures of the above.

5 exceptional
4 exceeds requirements
3 meets requirements
2 below requirements
1 unsatisfactory

Annex 8: Guide – Training & Competence

Definition

Champions continued development and training of staff to ensure that competency levels are maintained to support continued H&S performance.

Key behaviours/traits

- Clear and visible commitment to training and development.
- Committed to ensuring training is delivered to ensure that there are no skills or competency gaps.
- Regularly checks competence levels against company requirements.
- Enables a positive learning culture.
- Allocates sufficient resources to support training needs.

Outputs

- Fully trained and competent staff.
- Training needs analysis and development plans are used effectively.
- Staff receive refresher training within agreed time periods.

Performance indicators

- Demonstrates appropriate behaviours on a consistent basis.
- Regular engagement with team on delivery of training to support safe working.
- Sets appropriate training & development plans.
- Ensures that all workers (staff and contractors) are competent and fully trained.

Measurement

A blend of qualitative and quantitative measures of the above.

5 exceptional
4 exceeds requirements
3 meets requirements
2 below requirements
1 unsatisfactory

References

Managing for Health and Safety, HSG65, Health & Safety Executive, 2013

Leading Health and Safety at Work, INDG417, Health & Safety Executive, 2013

Calculating the International Return on Prevention for Companies: Costs and Benefits of Investments in Occupational Safety and Health, ISSA, 2013

Seven Golden Rules for Safe and Economical Mining, ISSA Mining Section http://steine-und-erden.net/ekf/index.html

Investigation of Human Factors Safety Issues within ENA, Health & Safety Laboratory, 2009

Powering Improvement, Asset Management Output 1, Electricity Competency Framework, 2012

INDG 163, 'Risk Assessment, A brief Guide to Controlling the Risks in the Workplace', HSE, 2014