



**LINCOLN COLLEGE**

**HEALTH AND SAFETY POLICY**

**POLICY CO/PO/17**

**SPONSOR**

Health and Safety Officer

## **Equality and Diversity Statement**

Lincoln College strives to treat all its members and visitors fairly and aims to eliminate unjustifiable discrimination on the grounds of gender, race, nationality, ethnic or national origin, political beliefs or practices, disability, marital status, family circumstances, sexual orientation, spent criminal convictions, age or any other inappropriate grounds.

# LINCOLN COLLEGE

## HEALTH AND SAFETY POLICY

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# **LINCOLN COLLEGE**

## **HEALTH AND SAFETY POLICY**

### **1 PURPOSE**

- 1.1 The purpose of this Policy is to outline the approach by Lincoln College (the College) to manage health and safety.
- 1.2 Lincoln College has based the health and safety management system in accordance with the latest guidance available from regulating bodies, including the Health and Safety Executive (HSE).
- 1.3 In accordance with current guidance, this Policy contains an overall statement of policy, an organisation section detailing the roles and responsibilities of individuals and groups in relation to health and safety and details in the arrangements section how on health and safety is managed.

### **2 SCOPE**

- 2.1 This Policy applies to all of the College premises and all those who work in and visit them; including employees, students, agency employees, volunteers, trustees, visitors, contractors, and third-party service providers.

### **3 POLICY STATEMENT**

- 3.1 It is the Policy of the College to ensure, so far as is reasonably practicable, the health and safety of all persons as identified in section two who may work on, visit, or use College premises, or who may be affected by its activities, products used, or services.
- 3.2 In order to achieve this aim, it is College policy to provide the appropriate resources to achieve a healthy and safe working environment, provision of safe equipment, the use of safe systems of work and provision of adequate information, training and supervision.
- 3.3 The College will remain up to date with regard to its legal responsibilities and requirements through various media, including legislation updates and CPD undertaken by internal health and safety resources.
- 3.4 The College considers the management of health and safety, including fire safety issues as an essential part of governance arrangements. This includes a commitment to prevention of injury and ill health and to continual improvement in Occupational Health and Safety management and performance. It also includes a commitment to comply with applicable legal requirements and with other requirements to which the organisation subscribes.
- 3.5 Where the College engages with external contractors to undertake or manage work on its premises, it is the Policy to work with competent contractors who have an effective and established health and safety management system and who will undertake their work either in accordance with Lincoln College Contractor Rules and Permit to Work systems or with an agreed alternative, which provides an equivalent standard. Before engaging such contractors, Lincoln College will therefore make reasonable enquiries to check that the contractor is competent to undertake the work safely and without risks to health.
  - 3.5.1 The College will keep the performance of external contractors under review in order to ensure satisfactory standards of health and safety are maintained.

- 3.6 Where temporary or contract staff are working on College premises, the same health and safety standards will be provided for them.
- 3.7 Where the College acquire new premises or develop new activities, a health and safety review of the prospective developments will be undertaken as part of normal due diligence process.
  - 3.7.1 In the event of the acquisition / development proceeding, an improvement plan will be put in place to address any deficiencies identified in the review, if necessary.
- 3.8 The College will ensure all service areas have access to appropriate health and safety, and fire safety, advice and support. Employees will be consulted on health and safety matters with a view to actively involving employees in the effective implementation of this Policy. Such consultation will be undertaken through prevailing arrangements in place at the College, with employees directly as appropriate to the location and employee group concerned.
- 3.9 The College will set and review health and safety objectives annually, in order to monitor performance and strive towards continuous improvement.
- 3.10 Objectives will be set by the Health & Safety Committee in the first instance, before being approved by the Executive Leadership Team (ELT) and ratified by the Board of Governors.
- 3.11 This Policy and the health and safety performance of the College will be reviewed annually, and at any other time when there are significant changes in our operations or management.
- 3.12 The following sections describe the organisation and responsibilities of the ELT, Principal /CEO, Directors, Managers and staff within the College on implementing the above Policy and gives details of the general health and safety arrangements and standards to which we operate.



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Mark Locking  
Principal / CEO  
05 September 2022

## **4 ROLE AND RESPONSIBILITIES**

### **4.1 BOARD OF CORPORATION**

4.1.1 Lincoln College Board of Corporation have the overall responsibility for health and safety matters within the College and specifically for:

- Providing a general statement on the Health and Safety Policy and for agreeing the arrangements for the implementation and monitoring of the effectiveness of the Policy;
- Approving the annual review of the Policy on the advice of the Principal/CEO;
- Annually review the health and safety performance of the College, , by considering the Health and Safety Annual Report submitted to Audit Committee and Board of Corporation;
- Ensuring there are adequate resources allocated for effective management of health and safety and the implementation of this Policy;
- Ensuring that Board of Corporation decisions are consistent with the objectives of the Health and Safety policy.

### **4.2 PRINCIPAL/CEO**

4.2.1 The Principal/CEO has overall executive accountability for health and safety matters within the College.

4.2.2 The Principal/CEO has delegated authority for health and safety planning, coordination and monitoring to the Group Director of Finance & Commercial.

4.2.3 The Principal/CEO and Group Director of Finance & Commercial will have a direct oversight of health and safety within the College.

### **4.3 EXECUTIVE LEADERSHIP TEAM**

4.3.1 ELT has overall responsibility for ensuring that effective systems are in place for managing and monitoring the standards for health and safety within the College. ELT comprises the following roles:

- Principal/CEO;
- Managing Director of International and Commercial;
- Group Director of Finance & Commercial;
- Group Director of Human Resources and Student Support Services;
- Group Director of IT, Information Management and Projects;
- Group Head of Marketing and Communications.
- Director of Strategic Development;
- Director of Planning and Performance.

4.3.2 ELT will ensure that health and safety is kept under review and that all relevant decisions are consistent with this Policy of developing and maintaining high standards of health and safety.

4.3.3 ELT via the Group Director of Finance & Commercial will formally review health and safety arrangements and provide a report to the Audit Committee with onward referral to the Board of Corporation on issues arising and action proposed or taken.

#### **4.4 THE HEALTH AND SAFETY COMMITTEE**

- 4.4.1 The Health and Safety Committee (the Committee) meets three times a year to review health, safety, occupational health, and environment and property safety issues.
- 4.4.2 The core membership is the Group Director of Finance & Commercial, Health & Safety Officer, union representation, an academic area representative and others deemed suitable to be co-opted onto the Committee.
- 4.4.3 The core membership of the Committee is supplemented by the College management representatives from operational departments or their representatives. Other Directors and staff may attend the Committee periodically.
- 4.4.4 The members of the Committee are required to attend except in exceptional circumstances in which case the Chair must be informed in advance and an alternative attendee must be agreed.
- 4.4.5 The Committee may call upon specialist staff, or experts as necessary to the areas being discussed.
- 4.4.6 The function of the Committee is to:
- Review identified health and safety issues throughout the College, in relation to health and safety, fire safety, security and environmental protection;
  - To support, approve and ratify the health and safety policies and strategies;
  - Advise ELT and the Audit Committee on the content of proposed health and safety policies and procedures for their approval;
  - Monitor safety standards achieved throughout the College and report on any key areas of concern and recommended actions to ELT;
  - Inform ELT of any changes, legal requirements, and good practice in terms of health and safety, and recommend and implement an appropriate course of action;
  - Provide specialist advice relating to matters within the remit of the Committee;
  - Review via the Health and Safety Officer or Group Director of Finance & Commercial, as appropriate, the health and safety implications of any proposed changes in relation to business activity undertaken, major changes in organisational structure, outsourcing or in-sourcing projects or business acquisitions or divestments;
  - Receive reports identifying necessary actions to ensure adequate standards are maintained while keeping ELT informed;
  - Review health and safety incident statistics and trends reporting relevant and appropriate information to ELT;
  - Monitor any contact and involvement with health and safety, fire safety and environmental enforcing authorities;
  - Review reports on health and safety audits undertaken across the College and advise on any appropriate actions needed.

#### **4.5 GROUP DIRECTOR OF FINANCE & COMMERCIAL**

- 4.5.1 The Group Director of Finance & Commercial is responsible to the Principal /CEO for the effective oversight of the governance process and in particular for:

- Approve the health and safety policies and procedures to meet governance objectives and deliver to ELT and the Audit Committee for their approval;
- Deliver relevant reports and updates to ELT and Board of Corporation on governance matters where these relate to health and safety;
- Ensuring, with the assistance of the Health and Safety Officer that ELT and subsequently Board of Corporation are advised on significant health and safety issues, and receive and consider a quarterly update and annual report on health and safety matters;
- Establishing effective systems of governance incorporating the specific arrangements for health and safety management developed by the Health and Safety Officer and the Health and Safety Committee;
- Periodically reviewing the effectiveness of the governance systems, with the assistance of the Health and Safety Officer, reporting to ELT and Board of Corporation on the outcomes and the plans for improvement where applicable;
- Ensuring, in consultation with Principal/CEO, and through the business planning process, that there are adequate resources and assistance to properly discharge the functions allocated under this Policy;
- The financial planning process takes adequate account of the need to resource health and safety requirements in accordance with this Health and Safety policy;
- To ensure the financial regulations and procurement procedures include relevant compliance for health and safety when appointing an external firm.
- Advice is sought from the Health and Safety Officer or external sources on any prospective changes to health and safety legislation which may have significant cost implications, these can be incorporated in the financial planning processes;
- Insurance arrangements, meeting the requirements of the Employers' Liability (Compulsory Insurance) Regulations, are maintained.

## **4.6 HEALTH AND SAFETY OFFICER**

4.6.1 The Health and Safety Officer is responsible for delivering, assisting and advising the College in all aspects of health, safety and fire safety management with the support of the retained external health and safety consultants. In particular, the Health and Safety Officer is responsible for:

- Providing advice and support to Directors and managers on all aspects of health and safety management;
- Supporting the Group Director of Finance & Commercial in fulfilling their responsibilities allocated under this Policy;
- Assisting the Group Director of Finance & Commercial to ensure that the Executive Leadership Team and Board of Corporation are advised on significant health and safety issues and receive and consider a quarterly update and annual report on health and safety matters;
- Advising the ELT, via the Group Director of Finance & Commercial, on the content of proposed Health and Safety policies and procedures;
- Reviewing reports on health and safety audits undertaken across the College and advising line managers on any appropriate actions needed;
- Assisting in the evaluation of any new business premises or facility, in order to identify any serious health and safety deficiencies and clearly identify the corrective action that requires implementation;
- Continuously developing, with the assistance of the appointed health and safety consultancy, the arrangements for the management,



- monitoring and review of health and safety throughout the College, including maintenance and accessibility of the health and safety policies;
- Liaising with authorised health and safety consultants on the development of suitable internal health and safety policies and procedures in response to new health and safety and fire safety legislation and coordinating the internal response within the College to changes in such legislation;
  - Coordinating the implementation of changes to health and safety and fire safety policies and procedures;
  - Annually reviewing with the Group Director of Finance & Commercial the effective discharge of the College's allocated health and safety responsibilities and providing feedback on the outcome;
  - Instigating an audit programme, which involves a review of the health and safety management system and fire safety arrangements in practice at all the College locations;
  - Devising and implementing a programme to monitor the health and safety standards of appointed contractors;
  - Initiating and supporting the investigation of serious health and safety incidents, coordinating the College response and liaising with the enforcement authorities;
  - Ensuring that the College implements correct procedures for the statutory reporting and recording of accidents and incidents;
  - Developing an annual health and safety improvement programme incorporating the findings and recommendations of the audit programme, the outcome of incident investigations and other current issues arising from the internal and external environment;
  - Ensuring an annual health and safety management plan is also devised and implemented by all areas of the College;
  - Supporting the Group Director of Finance and Commercial in providing briefings for relevant ELT in relation to health and safety improvement areas identified;
  - Assist in implementing appropriate training programmes to assist ELT and managers in carrying out their responsibilities in relation to all aspects of health and safety, including fire safety, security, control of biological hazards;
  - Support and update managers throughout the College, including participation in their training days;
  - Ensuring through the Group Director of Finance & Commercial and departmental managers, that there is an adequate and coordinated programme of undertaking and updating risk assessments for all College activities and monitoring that this is undertaken effectively;
  - Maintaining a sound level of technical knowledge through a programme of continuous professional development and appropriate professional training;
  - Maintaining communications with the Group Director of Finance & Commercial to provide strategic advice to Lincoln College;
  - Liaising through the Finance department with insurers in response to civil liability, business disruption and property damage claims arising from health and safety incidents;
  - Coordinating the College's relationship with the Health and Safety Executive (HSE) and relevant local authority Environmental Health Departments.
  - Liaising with Directors, Leads and Operating Managers to monitor implementation of policies and procedures and identify areas for improvement;
  - Ensuring that there are adequate arrangements for the provision of competent health and safety and fire safety support and advise the

Committee in accordance with the requirements of the Health and Safety at Work Act 1974, the Management of Health and Safety at Work Regulations 1999, the Regulatory Reform (Fire Safety) Order 2005/ Fire Safety (Scotland) Regulations 2006, through an appropriate combination of external and internal resources;

- In respect of any prospective business acquisition, health and safety issues are reviewed as part of the normal due diligence process and an adequate plan is put in place to address such deficiencies in the event of the acquisition proceeding;

#### **4.7 DIRECTORS AND MANAGERS:**

- 4.7.1 Directors and managers have a general responsibility for the health and safety of staff under their control and others, whether employed by the College or not, who may be affected by work undertaken within their areas of responsibility.
- 4.7.2 Directors and managers are expected and required to comply with health and safety policies and procedures and to promote within their area of responsibility a culture which is consistent with high standards of health and safety performance.
- 4.7.3 They are also responsible for monitoring through the normal supervision and staff appraisal processes that their direct reports fulfil their responsibilities under this Policy.

#### **4.8 CURRICULUM LEADS/ CO-ORDINATORS:**

- 4.8.1 Curriculum Leads/Co-ordinators are responsible for inspecting their curriculum area to maintain a safe and healthy environment. They should communicate any concerns in their area by writing to the Health and Safety Officer.
- 4.8.2 Information received concerning health and safety should be passed, where relevant, to staff who should ensure that they and their colleagues are fully conversant with the health and safety rules and the literature pertaining to their particular situation.
- 4.8.3 It is the Curriculum Leads/Co-ordinator's duty to ensure that all such literature is readily available and, health and safety information warning of hazards and dangerous practices is displayed in prominent positions in working areas.
- 4.8.4 They should identify to the Health and Safety Officer any training requirements necessary to ensure continuing safe working practice. The Health and Safety Officer will ensure that all training needs identified are met using recognised training courses when appropriate.

#### **4.9 TEACHING AND NON-TEACHING STAFF**

- 4.9.1 These include Activity Organisers, Equipment and Resource Managers, Senior Administrative Staff, Caretakers.
- 4.9.2 These staff:
- Have a general responsibility for the application of the College's Health and Safety Policy to their own area of work and are directly responsible to the College's Health and Safety Officer as appropriate for the

application of existing safety measures and procedures within respective area of work;

- Shall establish and maintain safe working procedures in the area of work including arrangements for ensuring, as 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 (e.g. chemicals, boiling water, duplicating fluid, guillotines);
- Shall make every effort to resolve any health and safety problem in their area of work which any member of staff may refer to them, and refer to the Health and Safety Officer any of these problems for which they cannot achieve a satisfactory solution within the resources available to them;
- Shall ensure, as far as it is practicable, the provision of sufficient information, instruction, training and supervision to enable other employees and students to avoid hazards and contribute positively to their own health and safety at work;
- Shall report to the Health & Safety Officer on requirements for safety equipment and on additions or improvements to plant, tools, equipment or machinery which are dangerous or potentially so;
- Shall ensure that all hazardous materials used by the College are locked away in special stores when not in use.

#### **4.10 SPECIAL OBLIGATIONS OF CLASS – BASED TEACHERS**

4.10.1 The safety of students in class is the responsibility of class - based teachers; teachers by law carry responsibility for the safety of students when they are in charge.

4.10.2 Class - based teachers are expected to:

- Exercise effective supervision of the students and to know the emergency procedures, in respect of emergency evacuation and first aid, and to carry them out;
- Know the special safety measures to be adopted in their own teaching areas and to ensure that they are applied;
- Give clear instructions and warning as often as necessary;
- Follow safe working procedures personally;
- To ask for protective clothing, guards, special safe working procedures, etc. where necessary;
- To make recommendations to the Health & Safety (e.g. on safe equipment) and on additions or improvements to plant, tools, equipment or machinery which are dangerous or potentially so.

#### **4.11 EMPLOYEES**

4.11.1 All employees of the College have the following responsibilities for:

- Acting with due regard to the health and safety of themselves and others who may be affected by what they do, or fail to do, whilst they are at work, or on the College premises;
- Complying with instructions and procedures relating to health and safety and making full and proper use of any protective or safety equipment provided;
- Reporting to their manager any serious danger to health or safety, or defects in structures or equipment, or safety procedures that come to their notice and which they cannot immediately rectify;

- Reporting to their manager any incidents which have led, or might have led, to injury or damage, in addition to following the required local incident reporting procedure;
- Only using equipment or substances in accordance with information, instruction and training provided by the College.

4.11.2 Director, manager and employees of the College are not authorised to initiate, or continue any process or activity, which places any person on the premises in danger, or is in breach of statutory obligations with respect to health and safety.

#### **4.12 TEMPORARY, AGENCY, VOLUNTEER, AND SELF-EMPLOYED STAFF WORKING FOR LINCOLN COLLEGE AND CONTRACTORS OCCUPYING COLLEGE PREMISES**

4.12.1 All temporary, agency, volunteer, self-employed staff working on the College premises and contractors occupying related accommodation will be expected to comply with the College's health and safety arrangements.

4.12.2 All staff and volunteers will be advised of relevant and appropriate health and safety arrangements by the operational managers within operational locations.

#### **4.13 STUDENTS**

4.13.1 Students are expected to:

- Exercise personal responsibility for the safety of self and others;
- Observe standards of dress consistent with safety and / or hygiene (this would preclude unsuitable footwear, knives and other items considered dangerous);
- Observe all the health and safety rules of the College and in particular the instructions of teaching staff given in emergency;
- Use and not wilfully misuse, neglect or interfere with things provided for their safety;
- Report student infringements/non-compliance to a member of staff for further action.

#### **4.14 VISITORS**

- All visitors and other users of the premises (e.g. delivery – personnel or drivers from specific companies) are required to observe the health and safety rules of the College;
- All visitors should report to Main Reception on arrival where they will be asked to sign in indicating the nature of their business, who they wish to see and giving the registration number of their vehicle if it is on site. Similarly, all visitors are expected to inform Main Reception on departure;
- Visitors will be given a statement of emergency procedures;
- If any member of the public refuses to leave the premises or constitutes a nuisance a member of the Security team can be asked to phone the Police and request immediate assistance;
- Visitors who are contractors on site have special obligations which will be specified in contracts between the Company and the College.

## **5 ARRANGEMENTS FOR HEALTH AND SAFETY**

### **5.1 STANDARDS AND GUIDANCE**

- 5.1.1 Mandatory common standards and guidance are contained in the health and safety policies under the authority of the Group Director of Finance & Commercial and issued to all relevant staff.
- 5.1.2 The policies give information and required standards on a number of health and safety issues relevant to the College.
- 5.1.3 Where internal guidance or standards do not cover a specific issue, the practices or standards recommended in Health and Safety Executive publications or relevant British or European Standards will be adopted.

### **5.2 COMPETENT PROFESSIONAL HEALTH AND SAFETY SUPPORT AND ASSISTANCE**

- 5.2.1 The Group Director of Finance & Commercial has responsibility for ensuring there is a coordinated provision of competent health and safety advice and assistance to the College from a combination of a Health and Safety internal team, internal specialists and industry working groups.
- 5.2.2 The Group Director of Finance & Commercial will ensure that there are arrangements for providing ELT and Board of Corporation with guidance on internal policies and procedures and assist in obtaining any detailed health and safety information required.
- 5.2.3 Day to day advice and assistance on health and safety matters at individual operating locations is provided by the internal health and safety team.

### **5.3 RISK ASSESSMENTS**

- 5.3.1 The College has comprehensive arrangements in place for undertaking risk assessments relating to general risks and specific risk areas.
- 5.3.2 These arrangements are specified in the Health and Safety Policy on risk assessment and are undertaken by nominated trained staff. In the case of complex risks, the assessment will be undertaken by a specialist.

### **5.4 ACCIDENTS, DANGEROUS OCCURRENCES AND ILL HEALTH REPORTING**

- 5.4.1 Accidents to employees, or others, on the College premises, or affected by College activities, must be reported immediately to the relevant line manager and escalated in accordance with the College's Incident Reporting Policy.
- 5.4.2 The incident and near miss reporting procedure must be followed.
- 5.4.3 The Health & Safety Officer in accordance with this Policy will submit statutory accidents or dangerous occurrence reports to the enforcement authority and make statutorily required accident and incident records. The same procedure covers cases of occupational ill health or dangerous occurrences.

## **5.5 TRAINING**

- 5.5.1 All new employees will receive relevant instruction and induction training on health, safety, fire safety and welfare matters from their line manager and through an induction process.
- 5.5.2 Specific health and safety training will be provided for employees, as appropriate to the work being undertaken.

## **5.6 CONTRACTOR CONTROL ARRANGEMENTS**

- 5.6.1 Where contractors are engaged to undertake minor work on the College premises, they will be required to work in accordance with the relevant health and safety standard requirements.
- 5.6.2 Where the work to be undertaken falls within the requirements of the Construction (Design and Management) Regulations 2015, the work will not be permitted to proceed until the appointed Principal Designer has produced an adequate construction phase health and safety plan for the work involved and other relevant requirements of the College, as the client, have been fulfilled in line with requirements prevailing at the time.

## **5.7 FIRE SAFETY**

- 5.7.1 The College has established standards and policies to ensure that the risk of fire is minimised, and should a fire occur it can be contained with all persons in the premises being removed from areas of risk.
- 5.7.2 A detailed Fire Safety Policy is contained within the range of Health and Safety policies.

## **5.8 FURTHER HEALTH AND SAFETY POLICIES, PROCEDURES AND ARRANGEMENTS**

- 5.8.1 To carry out the responsibilities and duties within the Health and Safety Policy the College has a number of policies, procedures and arrangements in place all of which are available for information and guidance.
- 5.8.2 Policies include:

T:\[DOCUMENTS]\CollegePolicies\Facilities Policies

- Contractor Management Policy
- Vehicle Fleet Policy
- Lone Working Policy
- Asbestos Policy
- Environmental Sustainability Policy
- Adverse Weather Policy

T:\[DOCUMENTS]\College Policies\Health and Safety Policies

- Legionella Management
- Homeworking
- CoSHH
- Management of Materials containing Asbestos
- Fire Safety Policy
- Eye Test Procedures for DSE
- Driving for Work Policy
- Smoking Policy

- Legionella Management Policy

T:\[DOCUMENTS]\College Policies\Corporate Policies

- Risk Management Policy
- PEEPs Policy
- Bomb Threat Policy

5.8.3 Procedures include:

- Fire Action and Evacuations
- Accident Reporting and Investigation
- Risk Assessment and Safe Systems of Work
- Near Miss Reporting Procedures
- Electrical Safety and Testing
- New and Expectant Mother Assessment

5.8.4 Arrangements / Guidance include:

- Health Surveillance guidance
- Fire Arrangements
- First Aid Arrangements
- Hazardous Substances
- Hazard Reporting
- Manual Handling (MSD)
- Visitor Arrangements
- Statutory Test/Inspection
- Electrical Equipment Arrangements
- Personal Protective Equipment
- Aggression and Violence
- Major Disaster Arrangements (contained within the Business Recovery Procedure)

**FAILURE TO OBSERVE ANY PART OF THIS POLICY MAY LEAD TO DISCIPLINARY ACTION BEING TAKEN**

## **6 DOCUMENTS ASSOCIATED WITH THIS POLICY**

6.1 This Policy is the overarching Lincoln College Health and Safety policy, which forms part of and relates to all Lincoln College Health and Safety policies.

6.2 The following are referenced in this Policy:

- *The Health and Safety at Work, etc. Act 1974 – Section 2(3)*
- *The Management of Health and Safety at Work Regulations 1999, as amended – Regulation 5*
- *The Regulatory Reform (Fire Safety) Order 2005 – Article 11*
- *The Fire Safety (Scotland) Regulations 2006, Regulation 11*
- *The Construction (Design and Management) Regulations 2015*
- *The Employers' Liability (Compulsory Insurance) Regulations 1998*
- *Health and Safety Executive and Institute of Directors Guidance Document "Leading Health and Safety at Working 417:2011"*

**7 PROCESSES FOR MONITORING COMPLIANCE TO EFFECTIVENESS OF THE POLICY**

- 7.1 The effectiveness of this Policy will be monitored as part of routine health and safety monitoring arrangements for the respective facility through a combination of internal inspection and annual internal and external audits.
- 7.2 This Policy will be annually reviewed by the Health and Safety Officer and Group Director of Finance and Commercial.
- 7.3 Following this the Policy will be reviewed and approved by the Audit Committee (acting on behalf of the Board of Corporation) annually and at any other time when there are significant changes in our operations or management.