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## Scope

This policy outlines the health and safety arrangements for all those working for the NAS.

Managers should develop extra health and safety arrangements if local risk assessments show that this is needed. Managers must make sure that their staff and volunteers know about the extra arrangements, and must monitor and review the arrangements in light of any events or change of circumstances.

## Policy Summary

This policy outlines the roles, responsibilities, communication, consultation and training arrangements for health and safety across the National Autistic Society (NAS). Other health and safety arrangements are set out in separate policies.

This policy reflects our commitment to ensure that health and safety at work is paramount to our business and that effective health and safety actively contributes to our success.

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# 1 Statement of Intent

The National Autistic Society (NAS) acknowledges its duties under the Health and Safety at Work etc. Act 1974 and all other current Health, Safety and Environment legislation. We endeavour to ensure the health, safety and welfare of all our people and others who may be affected by our work activities through the way we work and behave.

We inspire and lead by promoting best practice in all that we do. Senior managers demonstrate visible leadership in health and safety and provide people with opportunities to raise concerns and time to reflect and identify new and improved ways of working to effectively manage risk.

Our active and open consultation and communication strategy provides a platform for everyone to tell it like it is and encourages an open, ongoing and determined commitment to improve health and safety at work throughout our organisation.

We ensure that risks are assessed and that people are informed of the risks together with any arrangements in place to prevent, reduce or manage risks.

We will provide resources to ensure that all our people, sub-contractors and stakeholders have the necessary equipment, information, training, instruction and supervision to work safely and without risk to health.

We will report and investigate accidents, incidents and near-miss events and take corrective action to reduce the risk of recurrence.

We will actively and openly monitor our arrangements and performance against improvement plans and take action to integrate health and safety into everything we do.



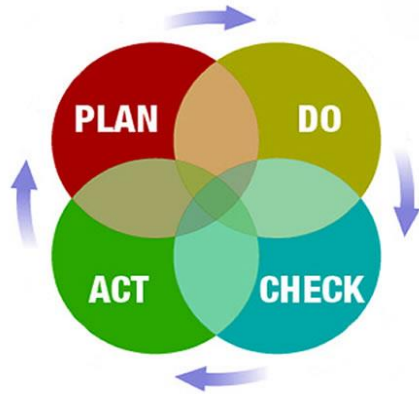
Chief Executive

The National Autistic Society

February 2023

## 2 Health and Safety Management System

The NAS embraces the Health and Safety Executive’s health and safety management system, HSG 65, as an integral part of its management arrangements. The four key elements of the HSG65 cyclic process are below:



**Plan:** Policy and planning

**Do:** Risk profiling, organising and implementing the plan

**Check:** Measure performance and investigate accidents, incident and near-miss events

**Act:** Reviewing performance and learning lessons

This policy is part of a suite of documents outlining the core health and safety management standards and arrangements.

Topic specific arrangements can be found on the health and safety pages on [SharePoint](#).

A checklist is provided at Appendix A for operational managers to identify the key actions required to comply with this policy.

## 3 Roles and Responsibilities

The NAS roles and responsibilities for health and safety are outlined below:



Key health and safety responsibilities will be outlined in job descriptions. The roles and responsibilities specific to this policy, will be performed, so far as is reasonably practicable as follows:

### 3.1 Chief Executive:

- Demonstrate visible health and safety leadership
- Set the policy for Health and Safety and ensure its review
- Ensure that adequate resources are provided for health and safety
- Nominate a lead director for health and safety

### 3.2 Directors:

Directors have collective and individual responsibility for health and safety management systems in their areas of responsibility and will:

- Incorporate health and safety into the organisation's planning strategy
- Include health and safety as a key business risk in board decisions
- Promote, endorse and support the Health and Safety Policy through strong, visible leadership
- Provide sufficient resources to effectively manage health and safety
- Resolve any conflicts between safety practice and the operational goals of the NAS
- Ensure that health and safety is a standing agenda item on Education Quality and Development (EQD), Services Quality & Development (SQD) and Senior Management Group (SMG)
- Demonstrate a commitment to the communication and consultation arrangements
- Attend the National Health, Safety and Wellbeing Committee to provide performance reports and disseminate information within their areas of responsibility

### 3.3 Area Managers and Principals:

Area Managers and Principals will:

- Promote, endorse and support the Health and Safety Policy through strong, visible leadership
- Consider health and safety business risks during the preparation, agreement and implementation of service development plans
- Ensure that arrangements are in place to ensure that all staff and volunteers are aware of their health and safety responsibilities
- Act as a primary contact for all local and area safety matters
- Ensure compliance with NAS health and safety policies and arrangements
- Support the local risk management programme to identify and take action to control risks and escalate Top X risks to their Director
- Ensure that arrangements are in place to confirm that health and safety risk assessments are undertaken and that timely action is taken to effectively manage risk
- Escalate concerns and conflicts between safety practice and operation goals to their Director and the National Lead for Health and Safety

- Ensure arrangements are in place to appoint a Health and Safety Coordinator (where this function is not fulfilled by the Business Manager) and provide them with the resources necessary to enable them to effectively carry out their role
- Ensure the timely reporting, recording and investigation of accidents
- Ensure that arrangements are in place to effectively monitor health and safety performance
- Ensure that all services/sites/staff have access to a local Safety Action Group (SAG) by direct representation or via Health and Safety Representative(s).
- To notify the health and safety team of any sites/teams who do not have direct access to a SAG

### 3.4 **Registered Managers, Lead Managers, Business Managers, Service Managers (and other members of the local senior management team)**

Members of the local senior management team will:

- Promote, endorse and support the Health and Safety Policy through strong, visible leadership
- Ensure that arrangements are in place to ensure that all staff and volunteers are aware of their health and safety responsibilities
- Act as a primary contact for safety matters for their area of responsibility
- Ensure compliance with NAS health and safety policies and arrangements
- Support the local risk management programme and escalate Top X risks to their Area Manager or Principal
- Identify all areas/teams/services/sites and ensure they have access to a local SAG
- Notify their area manager of any services who do not have direct access to a SAG
- Ensure that risk assessments are undertaken and that auditable records of risk assessments are retained in line with the risk assessment policy
- Escalate concerns and conflicts between safety practice and operation goals to their Area manager / Principal and the National Lead for Health and Safety
- Ensure that information, instruction and training requirements identified via the risk assessment process are notified to the local Staff Development Coordinator or Learning and Development Manager
- Ensure that appropriate and timely action is taken in line with the outcomes of local risk assessments
- Ensure that effective consultation and communication arrangements are in place and include the arrangements for the local election of Health and Safety Representatives
- Ensure that Health and Safety Representatives have the necessary resources to enable them to represent their peer group e.g. reasonable access to a computer and telephone, a NAS email address, access to the NAS intranet, etc.
- Ensure that Health and Safety Coordinators have the necessary resources to enable them to carry out their roles: e.g. reasonable access to a computer and telephone, an NAS email address, access to the NAS intranet, etc.
- Receive and take the necessary action in relation to any safety notices received from the health and safety team
- Business Managers duties to include section 3.6 of this policy

### 3.5 Supervisors and Team Leaders

Supervisors and Team Leaders are responsible for monitoring the working practices and conditions within the area under their direct control and will:

- Implement the requirements of the Health and Safety Policy and associated arrangements
- Ensure that consultation and communication arrangements are embedded to provide all staff with the opportunity to receive information and raise concerns i.e. H&S as a standing agenda item for team meetings, supervisions, etc.
- Ensure that risk assessments are undertaken and reviewed and that timely action is taken to manage risk effectively
- Ensure the co-operation and control of onsite third parties e.g. contractors, visitors, etc.
- Ensure the timely reporting and recording and investigation of accidents in line with the Accident Reporting and Investigation Policy
- Organise work to enable H&S Coordinators and H&S Representatives to perform their duties
- Escalate any health and safety concerns to their senior management team

### 3.6 Health and Safety Coordinators and Business Managers

Health and Safety (H&S) Coordinators and Business Managers play an important role in facilitating the day-to-day coordination of safety, health and environmental arrangements at the school / service / office in which they work, and in some circumstances at other 'Small Sites'

Health and Safety Coordinators receive a payment if the role is in addition to their substantive NAS role. It should be noted that no additional payment is made where the H&S Coordinator role is included in job descriptions. The role of Health and Safety Coordinator is included in Business Manager job descriptions and as such no additional payment is made. The role and specification for H&S coordinators can be found at Appendix B.

Managers may identify that a health and safety coordinator is required and will recruit to the role in agreement with the staff member. Managers retain accountability for the activities and functions carried out by the Health and Safety Coordinator.

Health and Safety Coordinators and/or Business Managers will:

- Coordinate the local Safety Action Group (SAG) and ensure that it operates as set out in the constitution at Appendix C
- Act as Secretary for the local SAG, in order to administer the SAG and ensure meetings are properly conducted and documented
- Provide minutes of SAG meetings to the National Health and Safety team
- Coordinate the recruitment of employee representatives who can act as Health and Safety Representatives (H&S Reps). The H&S Coordinator or Business Manager must ensure that Health and Safety Reps are accepted by the staff they

represent. It may be necessary to hold elections if there are numerous self-nominations by staff to become H&S Reps.

- Consult directly with employees if they don't have H&S Reps to cascade information and escalate concerns on their behalf
- Ensure relevant actions set by the National Health, Safety and Wellbeing Committee are acted upon
- Act as the link between the Health and Safety Team and their local groups to facilitate improvements in health, safety and environmental performance

### 3.7 **Property and Facilities Management Team will:**

- Identify, develop and implement arrangements to ensure that planned preventative maintenance to meet statutory requirements is in place
- Management of contractors to include preliminary information sharing, site induction and monitoring
- Ensure compliance with the requirements of the Construction (Design and Management) Regulations 2015 (CDM)
- Implement, monitor and review permit to work arrangements
- Liaise with key stakeholders during the planning and execution of work on operational sites
- Ensure that risk assessments are in place for all activities
- Provision of compliance reports to the National Safety Committee
- Liaise and work in partnership with the Health and Safety Team on the following matters: Capital developments, significant improvement works and facilities related policies and procedures

### 3.8 **Employees and Volunteers**

Employees operating in a safe and sensible manner are critical to the NAS achieving effective safety performance. The NAS recognises the valuable contribution made by volunteers and provides the same degree of protection as that provided for employees.

Employees and volunteers will:

- Take reasonable care of their own safety and the safety of others who may be affected by their acts or omissions whilst undertaking tasks on behalf of the NAS
- Comply with, and support others to comply with, health and safety arrangements
- Use equipment, protective clothing, systems of work and arrangements to achieve the required performance standard
- Report any faults or failures which might present a risk to themselves or others to their immediate supervisor/manager: Report concerns relating to equipment, place of work, systems of work or risk assessment arrangements
- Not misuse and/or intentionally or recklessly interfere with anything provided in the interest of safety
- Report any conflicts between safety practice and operational goals to their manager or Health and Safety Representative. Staff can also contact the national Health and Safety team directly or use the Whistle Blowing Procedure.



## Specialist functions:

### 3.9 Health and Safety Team (national)

The national health and safety team will:

- Provide advice, guidance and support in the field of health, safety and environment risk management, monitoring and control
- Mediate on all matters of interpretation of the Health and Safety Policy
- Act on information received to provide advice, guidance and support
- Communicate and facilitate the distribution of relevant safety information
- Ensure that health and safety information is up-to-date and available
- Communicate safety notices and maintain the safety notices database on SharePoint
- Maintain registers of key roles including: risk assessors, Health and Safety Representatives and Health and Safety Coordinators
- Receive and analyse data to inform policy change, provide specialist support and/or escalate trends and concerns
- Carry out health and safety risk profiling and act to seek compliance assurance
- Identify, develop, consult, monitor and review health, safety and environment policies and associated arrangements
- Coordinate the health and safety policy and associated arrangements for consultation via the National Health, Safety and Wellbeing Committee and final approval by the Chief Executive
- Define, develop, monitor and review health and safety training
- Provide timely regulatory updates to the National Health, Safety and Wellbeing Committee (NHSWC)
- Provide compliance reports to the NHSWC
- Coordinate and provide administration for the NHSWC
- Liaise with enforcing authorities

### 3.10 Risk Assessors

The NAS has a register of risk assessors who can assist local managers in the risk assessment process.

Risk assessors will:

- Attend a suitable risk assessment training session and pass an assessment of competence prior to acting as a risk assessor
- Attend risk assessor refresher training in line with the NAS training matrix or sooner if required
- Act independently and impartially when carrying out risk assessments
- Refer completed risk assessments to their line manager for approval, action and sign off
- Seek specialist advice if required during the risk assessment process

It should be noted that managers retain direct accountability for any actions taken by staff performing this function.

### 3.11 **Staff Development Coordinators (SDCs) / Learning and Development (L&D) Managers**

SDCs and L&D Managers have responsibilities as follows:

- To work closely with local managers to ensure that all health and safety training requirements are identified through the completion of risk assessments and the Learning Needs Analysis (LNA) process
- To ensure that all essential health and safety training (including induction, refresher and CPD training) is delivered within reasonable timescales
- To ensure that accurate records of all health and safety training are maintained
- To ensure and that suitable prompts are provided in advance of the need for refresher training
- To monitor H&S training attendance and achievement of competencies
- To alert the Health and Safety team where local circumstances are preventing employees attending or achieving the required health and safety competences

### 3.12 **Health and Safety Representatives (H&S Reps):**

Health and Safety Representatives (H&S Reps) are 'elected' by staff to represent the staff group. They take on board the views of staff in order to get them involved in issues and provide opportunities to promote health and safety messages and encourage participation.

The role of the H&S Rep includes the following:

Role:

- Promote a positive health and safety culture
- Adopt and encourage others to follow the health and safety arrangements
- Raise local hazard and risk concerns with the manager and make recommendations
- To represent the staff group during health and safety consultations and make recommendations
- To represent the local workforce during any discussions with inspectors from the enforcement authorities i.e. Health and Safety Executive, Fire Service, etc.
- Attend local Safety Action Group (SAG)
- Participate in health and safety related investigations and inspections (as agreed locally)
- Opportunity to act as an Area H&S Rep and attend the National Health, Safety and Wellbeing Committee

Rights:

- Receive information, instruction and training to undertake the role
- Be given time within work to undertake the role
- H&S Reps and all employees are protected from unfair treatment when acting in good faith on health and safety grounds

Staff can put themselves forward to act as a local H&S Rep. If you wish to put yourself forward please discuss this with your H&S Coordinator or Business Manager and your interest will be communicated to the staff group you will be representing. If there are no objections you will be confirmed as representing the staff and you will be invited to the next local Safety Action Group meeting.

If multiple staff nominate themselves to represent staff a vote may take place. The H&S Coordinator will arrange for staff to vote for the person who they believe will best represent their views.

NB. The Manager must ensure that H&S Reps are provided with the necessary resources to enable them to effectively represent their peer group e.g.

- reasonable access to a telephone, an NAS email address
- access to the NAS intranet
- time to carry out their role
- time to attend the Safety Action Group and
- time to attend the National Health, Safety and Wellbeing Committee if they are recognised as an area H&S Rep.

Appendix D outlines the role and responsibilities of H&S Reps.

### 3.13 Occupational Health Service:

Occupational Health is provided by an external service provider. The NAS Occupational Health contract is managed by the Human Resources Director. A service level agreement is in place which includes the following health and safety compliance requirements:

- Advise HR on statutory health surveillance requirements relating to work activities undertaken across the NAS
- Provide information, instruction and guidance to the NAS where self-assessment health surveillance arrangements are required
- Liaise with the national Health and Safety Team on matters of occupational health compliance requirements
- Conduct fitness to work assessments and provide advice and guidance for the management and assessment of risks relating to individual staff health cases
- Undertake pre-employment assessments and provide reports to managers outlining any limitations
- Provide health education materials for use by the NAS
- Ensure that statutory health surveillance is undertaken in line with NAS requirements i.e. lung function, skin checks.
- Maintain health records and produce them on request by authorised persons
- Provide quarterly reports to the National Health, Safety and Wellbeing Committee outlining performance i.e. compliance with statutory monitoring requirements and any trends or concerns relating to management or self-referrals

### 3.14 Head of Learning and Development

- Include health and safety training in the NAS training development and delivery annual plan
- Include health and safety training as an agenda items for training related meetings
- Provide quarterly reports to the National Health, Safety and Wellbeing Committee to show progress with the national H&S training plan.
- Notify the health and safety team of any new or emerging risks or trends likely to prevent the health and safety related training plan objectives being met.

### 3.15 Other Advisors:

There are a number of specialist advisors and teams who can be contacted for advice, guidance and support with specific topic areas as listed below including:

- Positive Behaviour Support advisors
- Positive Behaviour Management (Wales) - Abertawe Bro Morgannwg University Health Board trainers
- Studio III advisors/trainers
- Moving and Handling of People advisors/trainers
- Manual Handling of inanimate objects advisors/trainers

It is not possible to provide up-to-date contact information for these advisors in this policy. You should contact your Staff Development Coordinator, Learning & Development Manager or line manager in the first instance if you require any support from these specialist teams.

## 4 Training and information

A skilled workforce is essential to effective health and safety performance. A number of key individuals have responsibilities to ensure that training is identified, resourced, developed, delivered, monitored and reviewed as detailed in Section 3 of this policy - roles and responsibilities.

All staff receive health and safety information, instruction and training at induction and subject/topic specific health and safety training requirements will be determined by your job role. Subject/topic specific training requirements are outlined in relevant health and safety policies.

Health and Safety Training is delivered by internal and external trainers utilising a blended learning approach of online and classroom-based learning.

Training standards and requirements to meet statutory requirements will be identified by the National Health and Safety team. Service specific arrangements and training delivery programmes will be developed through collaborative working between the following: National Health and Safety Team, Head of Estates, Internal Training, Staff Development Coordinators, Learning & Development Managers, Studio III trainers, Positive Behaviour Support and other internal and external specialist advisors.

Training delivery methods are monitored and reviewed to ensure they meet the needs of the learner through direct feedback. Staff are encouraged to notify their learning and development Manager, Staff Development Coordinator or line manager if they experience any difficulties with training delivery methods.

Health and Safety training takes place during working hours and is provided free of charge to employees and volunteers.

If you have any questions about your health and safety training please contact your Health and Safety Rep, Staff Development Coordinator, Learning and Development Manager or line manager in the first instance.

## **5 Communication and Consultation**

All sites and services of the NAS must have access to a Safety Action Group (SAG). It is recognised that some locations may have insufficient staff to form a quorate SAG and, in these circumstances, the National Health and Safety Team must be contacted so that they can provide advice on providing effective staff consultation arrangements. Sites with no SAG will register with the National Health and Safety Team and be referred to as Small Sites. This will allow the National Health and Safety Team to provide timely communication to Small Sites.

### **Site and team-based communication**

Everyone will have access to the information they need, when they need it, and will be able to raise concerns when they need to. We will do this by...

- Health and Safety will be a standing agenda item at all staff and management meetings to provide an opportunity for workers to express concerns about the health safety and welfare of themselves and those who are affected by what they do
- Managers should, in the course of their day-to-day management, discuss issues that could affect the wellbeing of their staff. For example, reinforcement of risk control measures implemented through risk assessment
- Support and supervision, appraisals, training briefings and debriefings are all opportunities for two-way communication about health and safety
- It is essential that managers provide timely and relevant information to the staff they are responsible for. This includes the requirements any relevant health and safety policies and any locally developed safe systems of work. The mandatory behavioural competency "I work safely..." must be discussed at regular intervals and always during appraisal
- All sites must have a "Health & Safety Notice Board" displaying or containing the information outlined in the checklist at Appendix F. Some sites may use a dedicated section of a general notice board for health and safety information and mobile teams may have a folder containing this information. It is essential that all staff are able to access this information. Local arrangements will depend on the nature of the site/service/location.

## 6 Policies, procedures and guidelines accessibility:

There are a number of topic specific policies, procedures and guidelines that set out the arrangements to ensure compliance with the Health and Safety at Work etc. Act, and the requirements of applicable Regulations, approved codes of practice and good practice standards.

These documents are available to all staff on SharePoint via the NAS intranet.

Managers must ensure that relevant health and safety documents are made available as hard copies if staff are not able to access key information via the intranet when they need it.

Relevant health and safety documentation must be made available in a format which will meet individual needs and to support any identified requirements for reasonable adjustments under the Equality Act (England, Scotland and Wales) or Disability Discrimination Act (Northern Ireland).

## 7 Monitoring policy compliance:

Compliance with this policy will be monitored by the National Safety Committee through the analysis of data received i.e. accident data, audit, investigation and quality monitoring reports. Information will be used to identify where policy arrangements require a review and/or individual sites/team require individual support, advice or guidance.

## 8 Policy Review:

This policy is subject to a three-year review unless an earlier review is prompted by significant changes to NAS arrangements or statutory requirements.

## 9 Policy issue, amendment and control:

- This Health and Safety Policy is available via the NAS intranet.
- If you need to have printed copies they must be kept up-to-date. A local register should be maintained documenting the location of printed copies together with the name of the person to whom it has been issued. It is very important that the local manager ensures any locally held controlled documents are updated as soon as revisions are made to the electronic version
- The H&S Team will be responsible for maintaining up-to-date information on SharePoint
- Any suggested amendments should be submitted to the H&S Team using the Amendment Request Form (ARF) (Appendix G). The person submitting the ARF will complete the form with as much detail as possible and send the form to [healthandsafety@nas.org.uk](mailto:healthandsafety@nas.org.uk)
- All suggested amendments will be considered during the next review of the policy unless the Health and Safety team consider the request to be of sufficient importance to require an immediate review. The health and safety team will

provide feedback to individuals requesting amendments. Feedback will acknowledge receipt of the request and provide a response to indicate if and when the suggested amendment will take effect

- All significant policy reviews will be subject to a period of consultation via the National Health, Safety and Wellbeing Committee
- The health and safety team will log any changes and issue an amendment where appropriate.

<b>10</b>	<b>Glossary</b>
EQD	Education Quality & Development (a Board committee)
H&S Coordinator	Health and Safety Coordinator – Previously known as Safety, Health and Environment (SHE) Coordinators. Acts on behalf of manager to coordinate some health and safety tasks
H&S Rep	Health and Safety Representative – Previously known as Representative of Employee Safety (RoES). A non-union health and safety rep acting on behalf of and representing staff.
H&S Team	National Health and Safety Team – Previously known as Safety, Quality and Environment (SQE) Team
NAS	National Autistic Society
NHSWC	National Health, Safety and Wellbeing Committee
RoES	See H&S Rep
SAG	Safety Action Group
SHE Coordinators	See H&S Coordinator
Small site	An office or service with an insufficient number of staff to form a SAG
SMG	Senior Management Group
SQD	Services Quality and Development (a Board committee)
Top X risks	This is a system used in the NAS to identify the greatest risks at each level throughout the organisation. It assists with the identification of those risks locally and nationally so that appropriate local and corporate action can be taken to reduce the most serious threats. “X” is deliberately undefined, but it will always be a numerical value used to identify the number of high risks that require the greatest attention. “X” does not mean 10. See Risk Management Policy for further information.
CDM	Construction (Design and Management) Regulations 2015 – Law that applies to the whole construction process on all construction projects from concept to completion.