

Health, Safety and Environment - what's in your policy?



Misunderstandings of and misrepresentation within HSE policies are a regular discussion subject at PEIMF committee meetings. Terry Moody is Vice President Global HSE for Gilbarco Veeder Root and is an established PEIMF Committee Member. Here, he attempts to throw some light on the subject.

Many businesses underestimate the importance of their Health Safety and Environment Policy, possibly because these days it is so easy to go onto the web and download a sample policy, add your company name and then offer it to interested parties as your own.

Whilst on the face of it, this may get you your 'ticket to the game', or the ability to bid in a tender or to be able to demonstrate some level of compliance, this can be an approach fraught with problems. Hopefully I can show here, that by taking a little more time and care on this important document, you will better benefit you and your operation.

What is it?

What is the HSE Policy? It is your statement to all stakeholders what your philosophy is regarding the management of Health, Safety and Environment in the workplace. Those stakeholders are both internal and external. Internal would include your employees. It is recognised widely that these things matter hugely to the Millennium Generation, more so than previously. I regularly get asked by new employees about our views on this subject, and environmental issues in particular.

External stakeholders are of course important too. We are all familiar with the need to submit policies with job tenders, so that potential customers can have the confidence that we take these things seriously and that they form a key part of

our business ethics. Less obvious maybe are your insurance company, shareholders and local residents located adjacent to your business. A worst case scenario could be enforcement agencies following an incident. This is when the cut and paste approach can trip you up badly.

Policies taken from the web, that have not been adapted to reflect the activity of your business, your control measures and your mission statement become very obvious very quickly. For example; adopting a statement from the web that states that you will monitor your staff with regular audits, when this is not the reality, will create all sorts of difficulties. Over the years I have often seen examples of small businesses adopting corporate policies that are unworkable and unrepresentative, and no thought has gone into the actual content. Remember, your written policy is a legal document and a legal requirement for all businesses with more than five employees. For businesses with fewer than five employees, technically there is no requirement to write the policy, but it is of course good practice.

It could be argued that, it is worse to fraudulently claim that you undertake lots of risk mitigation activities in a plagiarised policy, than to have no policy at all.

What should the content be?

Your policy should comprise three main parts.

1. The mission statement

This will typically talk about not harming people, not polluting the environment and ensuring compliance with local legal requirements as a minimum. It may mention a continuous improvement philosophy or abiding by accepted industry practices, which is very relevant to many PEIMF members. The mission statement is your high level goals and is the part that interested parties will typically read. It does not have to be pages and pages long. Two or three paragraphs will normally suffice.

2. The roles and responsibilities

This will talk about who within the company will do which tasks to ensure the mission statement above is met. This may involve tasks such as audits or communications, it will normally include provision of resource, training, and it may also include consultation with workers or unions etc. The roles and responsibilities will normally cover all levels of management, and possibly a reference to workers also. A good tip here is to cite job titles, rather than people's names; that way the policy stays valid when one of the management team leaves the business.

3. Health and safety arrangements

In our industry that may involve aspects such as confined space working, working at height, permit systems etc. It is vital that this part reflects your own business activities and the methods or systems that you will use to manage the risks down to an acceptable level. This part can often run to many pages. When examining policies from prospective sub-contractors, I regularly see policies that run to 50 or more pages, listing risk control methods for activities that you know the company in question does not undertake. In the likely event that the policy is reviewed following a significant incident, a misleading policy will create major difficulties at a time when you least need them.

As you can see, especially in parts two and three, creating a policy that aligns with your own business, people and activity is vital.

The HSE website has examples of basic policies which should help you get the ball rolling, www.hse.gov.uk

Furthermore, be careful when employing consultants to produce a policy for you. Unless you make it very clear, and they know your business intimately, there is a possibility that you will be offered yet another one size fits all solution.

Who?

Signatures and dates on HSE Policies are often the source of questions. Who should sign, should it be dated, how often should it be reviewed etc?

In the first instance, the most senior person in the business must sign the policy to indicate that top leadership has bought in. These days that primary signature is often supplemented by other business leaders, finance, HR, operations, sales - not forgetting the safety function. I like this approach. It signals to stakeholders that the whole management team believe in the contents of the policy. Of course it should be dated, and the date should reflect when the signatures were added - not when the policy was created. Cadence of review is also important. The Policy should be reviewed at least annually, or if anything significant changes. Those changes may include, but are not limited to:-



1. Changes in legislation
2. Changes in activity that the company undertakes
3. Changes in customer requirements
4. Changes resulting from a significant incident
5. Changes in the organisation structure of the company

If no changes are made, then as a minimum the date should be made current. Reading a company HSE policy with a date from 4 or 5 years ago, simply tells me that this is not a priority in the business.

The bottom line is this;
Your HSE Policy must say what you really do, and then you must do what it says! Follow that mantra and you will not go too far wrong.