

SE HEALTH AND SAFETY POLICY

Approved by:	Gill McNeill
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Contact	SE Health and Safety

Contents

- 1) **Introduction / Purpose**
- 2) **Scope**
- 3) **Chief Executive's Statement of Intent**
- 4) **Responsibilities**
 - a. Executive Leadership Team
 - b. Chief People Officer
 - c. Director of People
 - d. Director of Innovation and Investment
 - e. All People Managers
 - f. All colleagues
 - g. Head of Health, Safety and Environment
 - h. Health and Safety Manager
 - i. MD International and Energy Transition
- 5) **Supporting Safety Management within Scottish Enterprise**
- 6) **Health, Safety and Wellbeing Committee**
 - 6.1 HS&W Committee Champions
 - 6.2 Current Committee Members
- 7) **Management Arrangements**
- 8) **Health and Safety Accountability and Liabilities (inc: Board Members)**
- 9) **Fife Energy Park**
- 10) **Personal Data and Privacy Statement**
- 11) **Document Revision History**

1. **Introduction / Purpose**

The purpose of this policy is to ensure Scottish Enterprise (SE) meets its responsibilities under the Health and Safety at Work etc. Act 1974 and to ensure, as far as is reasonably practicable, the health, safety and welfare at work of all colleagues and others who may be affected by our activities.

There may be cases where external circumstances require the temporary suspension of certain elements of the policy in its current form and alternative arrangements put in place to reflect the existing situation. Should this happen, the relevant governance and communication protocols will be applied.

2. **Scope**

This policy applies to all UK colleagues and overseas local hires, including non-employed workers. For colleagues employed via Foreign, Commonwealth and Development Office (FCDO) platform, certain areas will be delivered by the FCDO as your employer.

The policy aims to go beyond the minimum legislative requirements of the relevant country in which we operate in, to safeguard the health safety and wellbeing of those involved with and/or may be impacted by our operations.

In order to ensure that this policy does not conflict with local legislation, adaptations to policy implementation may need to be considered and developed based on local knowledge and advice from the SE H&S Team.

3. CHIEF EXECUTIVE'S STATEMENT OF INTENT

Scottish Enterprise (SE) is fully committed to meeting its responsibilities under the Health and Safety at Work etc. Act 1974 and will comply with its duties under the Act. We will ensure, as far as is reasonably practicable, the health, safety and welfare at work of all colleagues and others who may be affected by our activities, with a particular focus on promoting a positive safety culture with zero accident/harm by committing to:

- the identification of risk within our operations and opportunities for mitigating this
- the provision of safe plant, equipment and systems of work
- the safe use, handling, storage and transport of articles and substances
- the provision of any required information, instruction, training and supervision
- a safe place of work, with safe access and egress
- a safe working environment with adequate welfare facilities
- the provision of health surveillance where necessary
- providing adequate resources, including competent advice where needed
- consulting on matters of health, safety and wellbeing (including psychological wellbeing) as required
- the setting of relevant health, safety and wellbeing objectives
- the continuous development of a strong health & safety culture

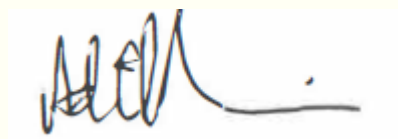
As Chief Executive, I am the Accountable Officer and ultimately responsible for ensuring that SE complies with all relevant Health and Safety legislative requirements and that appropriate systems and procedures are in place to allow SE to maintain, monitor and continually improve our overall health and safety performance.

The allocation of duties regarding safety matters and the specific arrangements in place to implement the policy are set out in the procedural documents within our health and safety management system.

All of us within SE have a responsibility for the health, safety and wellbeing of ourselves and others, as they relate to the activities we undertake, and it is important that we all understand our role and responsibilities in achieving this.

I, my fellow executive members and our Board are dedicated to this policy and the implementation and maintenance of the highest standards of health and safety across the business. We expect all workers, contractors, suppliers, visitors and others to share this commitment and work together to achieve it and in doing so we will work to prevent ill health and injury.

To ensure that this policy reflects current and changes to legislation, the policy and statement will be reviewed annually.

A handwritten signature in black ink, appearing to read 'Adrian Gillespie', with a horizontal line extending to the right.

Adrian Gillespie
Chief Executive

4. Responsibilities

a) EXECUTIVE LEADERSHIP TEAM (ELT)

Delegated authority and accountability for Health and Safety within SE at an operational and delivery level lies with SE's CEO (Adrian Gillespie)- CEO and Corporate Office and is discharged through the five Managing Directors (MD) of:

- People, Digital and Communication
- Innovation and Investment
- Productivity and Business Growth
- Energy Transition and International
- Chief Finance Office

Be responsible for embedding a positive safety culture and integrating health and safety with other management systems at all levels of SE.

Set a clear leadership example and promote a high degree of health and safety awareness.

Ensure that staff under their management control, understand their individual health and safety responsibilities, including the duty of care and liabilities.

Ensure the implementation of SE's health, safety, welfare and wellbeing requirements within their operational area.

Ensure direct reports report all accidents, incidents, near misses and road traffic accidents occurring to them whilst at work through SE's online Accident and Incident reporting system and actions identified through investigation to prevent a re-occurrence are implemented.

Provide assistance, support and information to the SE Health and Safety Team and Health, Safety and Wellbeing Committee as requested to ensure that health and safety within SE can be effectively managed and that our obligations are discharged, whether for staff, premises or work activities.

Actively support the delivery of any health and wellbeing programmes by encouraging organisation wide staff participation in activities and campaigns delivered to support these.

Ensure that where individuals have been assigned health and safety responsibilities within their Directorate that this is co-ordinated with the Health and Safety Team to ensure that they suitably support delivery of the safety management system.

Ensure that SE health and safety policies and associated guidance notes are adhered to by their direct reports.

Ensure that, where required for operational projects, appropriate budgets are available for health and safety purposes.

b) CHIEF PEOPLE OFFICER

The Chief People Officer has delegated responsibility from the CEO for ensuring health and safety matters within SE are effectively delivered.

Set a clear leadership example and promote a high degree of health and safety awareness.

Ensure that there are appropriate budgets available for health and safety purposes for both staff and premises.

Highlight to the CEO/Board/ELT any significant H&S matters that require senior involvement and awareness in delivery or support.

Ensure that there are sufficiently and suitably trained staff to deliver and manage health and safety.

Influence the strategic direction of health and safety at ELT and Board level - including risks resulting from planned organisational changes (change management).

Ensure that any significant accidents, incidents or near-misses are reported to ELT/SE Board (as appropriate) in a timely manner and that appropriate resources are available to investigation and reporting.

c) DIRECTOR OF PEOPLE

The Director of People has responsibility for the co-ordination of safety matters across SE.

Inform the CPO, Health, Safety and Wellbeing Committee and if appropriate, ELT about any significant failures or breaches to this policy and the outcomes of any investigations.	Ensure that any significant accidents, incidents or near-misses are reported to CPO in a timely manner and that appropriate resources are available to investigation and reporting.
Ensure that there are sufficiently and suitably trained staff to deliver and manage health and safety.	Ensure that there are appropriate budgets available for health and safety purposes for both staff and premises.
Ensure provision of an Annual H&S Report (and Running the Business reports) summarising levels of performance and providing reassurances that health and safety is being effectively managed across all parts of SE.	Ensure the provision of occupational health intervention is suitably resourced, effectively managed and reported on at appropriate levels to allow improvement programmes to be targeted.

d) DIRECTOR OF INNOVATION AND INVESTMENT

The Director of Innovation and Investment is responsible for ensuring that the delivery of health and safety across the Property, Growth Infrastructure and Major Projects Portfolio is effectively managed, mainly through the Property Managing Agent(s) contract(s) or by Project Managers on construction and development sites and co-ordinating this with the Head of Health, Safety and Environment (who has overall responsibility for SE H&S) and the overall SE strategy.

Ensure that practices and management of the portfolio are in line with the overall SE Health and Safety Policy/best practice.	Ensure arrangements are in place to assess and audit the health and safety compliance of all the SE Property and Growth Portfolio ensuring adherence to applicable health and safety legislation and best practice.
Provide adequate reports and detail of remedial actions taken to the Health, Safety and Wellbeing Committee and Head of Health, Safety and Environment to confirm that health and safety matters are being effectively managed by SE and third parties contracted to manage the portfolio on our behalf.	Chair the Energy Park, Fife (EPF) Duty Holder group to ensure SE operations and liabilities are effectively managed

e) ALL PEOPLE MANAGERS

People Managers are responsible for the day-to-day management of health, safety and welfare matters for their area of responsibility.

Ensure all SE health and safety policies and associated health and safety guidance notes are adhered to by their direct reports.	Understand their roles and their individual health and safety responsibilities, including the duty of care and liabilities as a People Manager within the H&S policy and work towards a culture of 'Zero Accident/Zero Harm'.
Co-operate with those responsible for the delivery of SE's health and safety and those upon whom a statutory duty or requirement is imposed.	Ensure direct reports receive and attend appropriate health and safety training to the appropriate frequencies.
Assist the Health and Safety Team where their direct reports require a workstation, maternity risk assessments or any other risk assessment.	Ensure direct reports adopt safe working practices and systems of work, particularly in the case of the young, the inexperienced and disabled persons.

Ensure direct reports operate the highest standards of housekeeping within the work area and keep emergency routes and equipment unobstructed at all times.	Ensure direct reports report all accidents, incidents, near misses and road traffic accidents occurring to them whilst at work through SE's online Accident and Incident reporting system.
All members of their team have actively engaged with the Driving for Work process prior to driving for work purposes and become approved drivers	Ensure new members of staff undertake the online induction training and complete the local health and safety induction on their first day in the office
All visitors and contractors, who may be subject to risks from our activities, are made aware of these risks and of the appropriate health and safety arrangements and controls in place	Actively support the delivery of any health and wellbeing programmes by encouraging organisation wide staff participation in activities and campaigns delivered to support these.
Request further support and guidance on ensuring that these measures are maintained through any member of the SE Health and Safety Team.	Support the ongoing implementation of SE's working from home processes/policies, ensuring colleagues use the equipment/furniture provided safely and follow the relevant guidance.

f) ALL COLLEAGUES

Take reasonable care for their own health and safety and those who may be affected by our acts or omissions at work.	Understand roles and responsibilities as laid out in the SE H&S Policy.
Co-operate with those responsible for the delivery of SE's health and safety and those upon whom a statutory duty or requirement is imposed.	Comply with SE health and safety policies and associated guidance notes.
Works towards a safety culture of 'Zero Accident/Zero Harm'.	Freely report health and safety concerns to their People Manager/any other senior person.
Observe all policies and instructions on health and safety.	Be aware of relevant emergency action plans and/or evacuation requirements.
Report all accidents, incidents, near misses and road traffic accidents occurring to them whilst at work through SE's online Accident and Incident reporting system.	Undertake and attend appropriate health and safety training to the required frequencies.
New members of staff are to undertake the online induction training within 5 working days of start date and complete the Local Health and Safety Induction on the first day of their nominated office.	All visitors and contractors, who may be subject to risks from our activities, are to be made aware of these risks and of the appropriate health and safety arrangements and controls in place.
Not intentionally, or recklessly, interfere with or misuse anything provided in the interests of health, safety or welfare or indulge in behaviour which may endanger themselves or others.	Wear the correct personal protective equipment (PPE) and clothing wherever the wearing of such protection is specified. Where it is not specified, consider the hazards before entering an area and obtain the correct PPE.
Operate the highest standards of housekeeping within their work area and keep emergency routes and equipment unobstructed at all times.	Upon discovering a hazard, take immediate temporary action, wherever possible, to make the hazard safe and report this is to support a 'See it, Sort it' approach.
Actively engage with the Driving for Work process prior to driving for work purposes and becoming approved drivers	Take heed of instructions and/or training given on the use of office equipment or safety devices.

Follow the relevant SE working from home processes/policies, ensuring equipment/furniture provided is used safely and the relevant guidance is adhered to.	Ensure that applicable risk assessments are read, understood and adhered to.
Ensure familiarity of local H&S arrangements in Hub/Workspace locations and follow these	Ensure awareness of role to take in the event of a fire

g) HEAD OF HEALTH, SAFETY, ENVIRONMENT AND WORKPLACE OPERATIONS

The Head of Health, Safety, Environment and Workplace Operations is responsible for the operational oversight of delivery of the safety management system.

Influence the strategic direction of health and safety at ELT and Board level- including risks resulting from planned organisational changes (change management).	Ensure ELT members are aware of their H&S liabilities and responsibilities, ensuring implementation of SE's health, safety and welfare procedures within their operational area.
Provision of clear and targeted H&S reporting at a senior organisational level, to allow informed decision making.	Set a clear leadership example and promote a high degree of health and safety awareness within the organisation.
Promotion of cross- departmental working at a senior level in line with the SE Safety Management System	Development, roll-out, monitoring and reporting on progress against the Safety Management System and H&S objectives.
Advise on and provide H&S resources within SE to meet legal/other obligations and ensure suitable competencies are in place.	Development, implementation and monitoring of progress.
Providing a focus for the ongoing Integration of SE operational areas into the Safety Management System.	Drive improvement and compliance of the Safety Management System within SE at a senior level.

h) HEALTH AND SAFETY MANAGER

The Health and Safety Manager (and team) provides the operational overview of health and safety matters for the organisation, ensuring H&S matters are co-ordinated and managed effectively.

Developing, maintaining, monitoring and improving key safety techniques to ensure there is an effective safety management system.	Providing, reviewing and updating SE's safety documents, including this statement of policy and relevant procedures, guidance and forms.
Reporting on health and safety issues and SE's safety performance to the Head of Health, Safety Environment and Workplace Operations	Ensuring health and safety requirements are considered as part of the tender and evaluation process where considered appropriate.
Undertaking, monitoring and reviewing the reporting, investigation, and follow up of incidents, where appropriate.	Identifying efficient and effective ways of delivering health and safety across the organisation.
Providing advice on the effectiveness of Hub/Workspace emergency plans and procedures.	Disseminating information within SE on statutory requirements codes of practice and internal standards relating to safety
Ensuring that internal health and safety training is delivered effectively.	Escalating significant issues to the Head of Health, Safety and Environment.

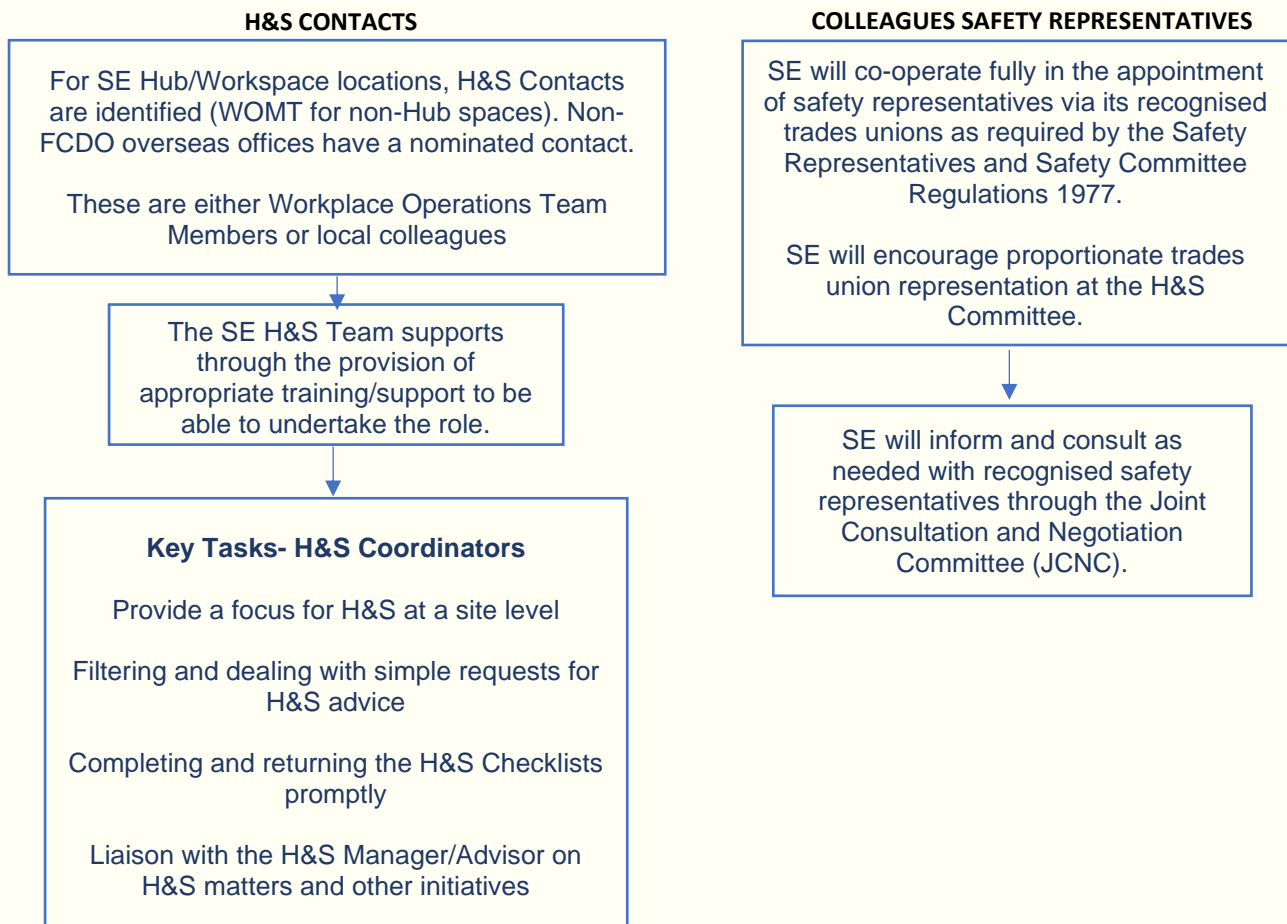
Auditing, monitoring and reviewing SE's safety performance.	Ensure appropriate training and support to the Health and Safety Co-ordinators is provided.
Implement and monitor the new start induction process.	Ongoing roll-out of effective H&S communications as required.

I) MD INTERNATIONAL AND ENERGY TRANSITION

The Managing Director- International and Energy Transition has responsibility for ensuring that SE colleagues and those working on behalf of SE are working in a safe environment and that they follow the applicable health, safety and welfare arrangements that apply to them. Where individuals are operating under the Foreign, Commonwealth and Development Office (FCDO) platform, some of the areas below will be delivered locally by the FCDO.

Supporting the completion of New Start Office H&S Inductions by new starts.	Supporting promotion of awareness of the SE travel policy- including the requirement to complete Travel Safety training and the travel risk assessment process.
Supporting the undertaking and completion of any required health and safety training within the required timescales.	Support having a nominated H&S Contact for each location to undertake workplace H&S checks as appropriate.
Support the requirement for individuals to be aware of emergency procedures as is relevant to their location.	Supporting completion of individual assessments, such as DSE, Young Persons and Expectant Mother assessments.
Supporting awareness of the accident/incident reporting process via the SE Accident and Incident System.	

5. Supporting Safety Management Within Scottish Enterprise



6. Health, Safety and Wellbeing Committee

A Health, Safety and Wellbeing Committee is in place to help agree and steer health and safety policy and other health & safety arrangements within the organisation.

The Committee will be made up of representatives to cover the operational areas under which SE works as well as colleague representatives as required (i.e. Trade Union).

Meetings will be held regularly during the financial year. There may be occasions where the Committee needs to be convened outwith the regular meetings due to exceptional circumstances that require consideration. These will be convened via the Committee Chair.

The main roles of the Committee are:

- To inform, challenge and guide the strategic and operational direction of Health & Safety.
- To act as an advisor and counsel to the SE Board in fulfilling its responsibilities in relation to Health and Safety, including Occupational Health and Wellbeing.
- Be an advocate for fostering and shaping a vibrant SE H&S culture, championing through the delivery of regular communications within the operational area and geographical reach
- Ensuring Health & Safety is a standard agenda item at team meetings.
- Sharing insights and perspective through blogs or Yammer pieces.

6.1 HS&W Committee Champions

Within the Committee, colleagues have been nominated to become Champions across specific areas.

This provides an operational focus on a specific topic area within the framework of the Committee and provide a focal point for conversation. This will be both at the Committee itself as well as through communications routes within SE to the wider business.

This role also helps to provide assurance to the Committee and the wider organisation that these key areas are being addressed effectively

Champions will provide a focus at HS&W Meetings to start the conversation in the agenda against their topic, supported by the Head of Health, Safety and Environment; including, but not limited to:

- Current status
- Any significant updates
- Any recommendations arising for changes to the Safety Management System
- Any feedback from their operational area relating to the topic
- Invite discussion from others

6.2 Current Health, Safety and Wellbeing Committee Members

Details of the current Health, Safety and Wellbeing Committee members can be found on our [Health and Safety Page](#).

7. Management Arrangements

These arrangements cover all SE staff and Hub/Workspace locations in the UK. For SDI offices co-locating with the Foreign, Commonwealth and Development Office (FCDO), they will be subject to the relevant FCDO H&S arrangements locally.

These arrangements are deemed an extension of this policy and therefore hold the same status in terms of the requirement to follow them.

All management arrangements, as well as additional guidance and forms can be found in our [Safety Management System](#).

8) **Health and Safety Accountability and Liabilities (Inc. Board Members)**

Whilst all individuals within the organisation have a general responsibility for health and safety (as detailed in the Health and Safety Policy Statement, Responsibilities section and Sections 2 and 7 of the Health and Safety at Work Act), there are those at a more senior level that will have additional duties of care and liabilities.

a. Accountability and Delegated Authority

Delegated authority and accountability for Health and Safety within SE on an operational and delivery level lies with SE's CEO (Adrian Gillespie) and is discharged through the six MDs of Corporate Office, Chief People Office, International and Energy Transition, Innovation and Investment, Chief Financial Office and Business Growth.

It is through this Policy that assurance on the effective management of health and safety matters is provided to the Board. The current governance process does not require that Board members be involved in health and safety operations.

SE's Audit and Risk Committee approves an Internal Audit Strategy and an Internal Audit Plan each year. The frequency in which each area of the business is audited is reviewed annually based upon risk. Health and Safety is currently audited every three years.

b. Liabilities of SE Board Members

In terms of SE Board member liabilities, it is recognised that Board Members may have a personal as well as corporate liability (potentially as a result of their action/inaction).

Personal Liability

- Health and Safety at Work Act 1974 (Sec 37)

'Where an offence...committed by a body corporate is proved to have been committed with the consent or connivance of, or to have been attributable to any neglect on the part of, any director, manager, secretary or other similar officer of the body corporate or a person who was purporting to act in any such capacity, he as well as the body corporate shall be guilty of that offence...

Corporate Liability

- Corporate Manslaughter and Corporate Homicide Act 2007 (Sec 1).
From an organisational perspective, guidance/decisions made at Board level may introduce a liability as below.

'An organisation...is guilty of an offence if the way in which its activities are managed or organised

- a) Caused a person's death, and b) amounts to a gross breach of a relevant duty of care owed by the organisation...'

c. Overseas Offices

Foreign, Commonwealth and Development Office (FCDO) Platform Offices

Under the Memorandum of Understanding from the FCDO, the Heads of Mission are responsible for the health and safety of those within that mission.

However, SE, and therefore Senior Managers/Directors, will still have a duty of care (and therefore a potential liability) for its staff in ensuring that FCDO health and safety processes and procedures are being followed.

Current FCDO Offices	• https://www.sdi.co.uk/about-us/global-offices
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d. Subsidiary Companies

SE operates a number of subsidiary companies, both in the UK and overseas.

In order to ensure the relevant levels of governance, the following arrangements will be in place.

For offices occupied as an SE subsidiary company (i.e. Scotland Europa and SCTR), then the SE Directors on the Boards of those companies (as detailed in Companies House), as well as SE as an organisation may have liabilities and accountability in line with local legislation.

Subsidiary		Governance
1	EBQ3	Annual check between SE H&S/Subsidiary Directors or Finance to confirm no change to subsidiary set-up/operations
2	ITI Scotland	
3	Design Dundee	
4	Glasgow Science Centre	Annual completion by Subsidiary Directors of FORM-H&S-015- Subsidiaries- Annual Assurance Checklist Returned to health.safety@scotent.co.uk upon completion
5	Ravenscraig	
6	Loch Lomond Shores	
7	Calder Park (Management Ltd)	
8	SCTR	
9	Scotland Europa	Covered as part of the SE H&S Policy

e. Mitigation of Liabilities

- Reports are provided to highlight key information across accidents, incidents and near misses, together with any other significant issues that require to be raised.
- The Health and Safety Committee reviews and monitors SE's health and safety policies and activities via regular meetings. Each business unit and SE's recognised Trade Union is represented.
- Annual Health and Safety Reports are provided to the Health and Safety Committee and the Annual Health and Safety Report is provided to the Executive Leadership Team and the Board.
- Regular review and updating of the Health and Safety Policy (and communications of changes to the organisation) takes place.
- A dedicated, professionally qualified Health and Safety Team is responsible for supervising all safety aspects of SE occupied Hubs/Workspaces in the UK and for providing an advisory, monitoring and development service to all other areas of the organisation.


- A H&S contact is available for each Hubs/Workspaces we occupy.
- SE co-operates fully in the appointment of safety representatives via its recognised Trade Unions as required by the Safety Representatives and Safety Committee Regulations 1977.

In terms of the governance we have in place, it is unlikely that individual SE Board members will be in a position where a lack of knowledge of significant health and safety concerns or a lack of assurance that such is being effectively managed should create a liability. However, Board Members should act/advise appropriately where significant issues/concerns have been escalated to that level.

9) Fife Energy Park

Scottish Enterprise has established a Duty Holder Group in order to ensure our obligations are being met as a marine asset owner under the Port Marine Safety Code (PMSC), a recommended best practice guide published by the Department for Transport.

This follows the guidance, and complies with, the requirements of the PMSC and aligns with Forth Ports (FP) (as the Statutory Harbour Authority (SHA)) Marine Safety Management System and recommendation that marine operations should follow the guidance around, and comply with, the requirements of Port Marine Safety Code within the wider Statutory Harbour Area

The details of how this is managed is held in the  [Terms of Reference](#) which provides information on:

- Details of tenants and relevant facilities
- Roles and responsibilities
- Purpose of the group and arrangements required to meet the PMSC
- Membership of the group
- Meeting and reporting requirements (including suggested meeting topics)

10) Personal Data and Privacy Statement

Whenever personal data of staff is processed under activities regulated by this Policy, such processing will be done in accordance with our Data Protection Policy (including, where relevant, the additional policies and guidance referred to in it) and our Internal Privacy Notice which can be accessed [here](#) or on request from Ask HR.

11) Document Revision History.

Version	Date	Author	Description of changes	Status
18	Oct 24	A Gregory	<ul style="list-style-type: none"> • General- update of Business Unit terminology • Scope- updated to reflect overseas offices • Sec 7- Movement of Management Arrangements to specific documents (with links provided) • Sec 7- Driving for Work arrangements updated to reflect new process • Sec 7- Health and Safety Training updated to reflect current process • Sec 7- Display Screen Equipment/Workstation Assessments- new policy requirements for equipment at home • Sec 7- Risk Assessment new policy requirement for colleagues to review Customer Facing Risk Assessment • Sec 8d- re-highlighting update for this version • Sec 9- addition of details for Fife Energy Park • Sec 10- Dealing with a Pandemic- now moved to Section 7 • Changing employees for colleagues 	Approved