

**ANNUAL HEALTH AND SAFETY AND ENVIRONMENTAL COMPLIANCE REPORT
2023/24 - Report by Chief Executive**

Summary

An important element of the governance structure relating to the charity's health and safety and environmental compliance performance is the annual Health and Safety and Environmental Compliance Report.

It is recommended that Directors note:

- i. that there were no notifications for improvement or enforcement actions during the reporting period;
- ii. that there were no environmental incidents requiring SEPA notification during the reporting period;
- iii. the low number and low severity of accidents or incidents over the reporting period, reflecting continuing good practice across the charity;
- iv. that the Health and Safety and Environmental Compliance Committee continues to meet quarterly with officers and the Charity's external Health and Safety advisers to review Health and Safety performance, and on reviewing the accident and incident trend data it concluded that there are no issues arising from this requiring charity-wide action;
- v. that the external safety audit was completed by QLM during August and October 2023 with an action plan created for risk reduction;
- vi. that there were no union safety audits completed within the reporting period; and
- vii. approve the updated Health and Safety Policy in **Appendix D**.

1. Business Plan Contribution

1.1 High Life Highland's (HLH) purpose is Making Life Better. The HLH Business Plan contains eleven Business Outcomes which support the delivery of this purpose, and this report supports the highlighted Business Outcomes from the HLH Business Plan:

- 1. Seek to continuously improve standards of health and safety.**
- 2. Commit to the Scottish Government's zero carbon targets and maintain the highest standards in environmental compliance.**
3. Use research and market analysis to develop and improve services to meet customer needs.
- 4. Increase employee satisfaction, engagement and development to improve staff recruitment and retention.**
- 5. Improve the financial sustainability of the company.**
- 6. Value and strengthen the relationship with THC.**
7. Develop and deliver the HLH Corporate Programme and seek to attract capital investment.
8. Use research and market analysis to develop and deliver proactive marketing and promotion of HLH and its services.
9. Initiate and implement an ICT digital transformation strategy across the charity.

10. Develop and strengthen relationships with customers, key stakeholders and partners.

11. Deliver targeted programmes which support and enhance the physical and mental health and wellbeing of the population and which contribute to the prevention agenda.

2. Background

2.1 The HLH Health and Safety Policy Statement requires annual and exception reporting to the HLH Board on health and safety performance.

2.2 At the HLH Board meeting on the 23 April 2014, Directors agreed to delegate to the Health and Safety Strategic Group, now the Health and Safety and Environmental Compliance Committee (as of 14 June 2018), the decision on the final content and structure of this report. The Committee reviewed and agreed the information in this report and accompanying appendices at its meeting held on 22 May 2024.

3. Health and Safety and Environmental Compliance Performance

3.1 There were no enforcing officer notifications for improvement, or enforcement actions during the reporting period. There were no environmental incidents requiring reporting to SEPA during the reporting period.

3.2 Having analysed the information in the appendices, the Health and Safety and Environmental Compliance Committee identified the following information as being important to report to the HLH Board:

- i. there are no trends indicating that any charity-wide actions are required. However, the Committee have seen an increase in incidents recorded under “Act of Violence” against HLH staff since 2022/23 and will continue to monitor this;
- ii. there were 21 accidents / incidents reported which were recorded as an “Act of Violence”, 10 were customer to customer and 11 were against HLH staff, this is a slight decrease from last year (2022/23 - 27 total, 14 customers and 13 staff);
- iii. there were no accidents reported under RIDDOR within the reporting period, (summary by service contained in **Appendix A**);
- iv. the HLH online reporting system continued to be developed to help improve the analysis of accidents and incidents within the reporting period (details contained in **Appendix B**);
- v. due to seven unrelated fire incidents in HLH facilities over 2017/18, close monitoring of all incidents that could have resulted in a fire within the reporting period was carried out with one incident recorded over 2023/24 (details contained in **Appendix C**).

3.3 Given the size of HLH and the large number of in-person customer engagements, the small number of accidents/incidents reflects good practice across all areas of work.

4. Annual External Audit

- 4.1 The annual external safety audit for 2023/24 examined the sites listed in the table below.

2023- 2024 Audits	Time	Service
Strathpeffer Pavilion	Full Day	Leisure
East Caithness Community Complex	Two Full Day	Leisure
Highland Folk Museum	One Full Day	Culture

- 4.2 During the audits actions were identified to reduce risk and the action within the reports are monitored by the Health and Safety and Environmental Compliance Committee. A small number of actions related to issues that affect multiple properties or services across HLH that are being managed by the Health and Safety team.
- 4.3 The completion of all action plans has been set for the end of April 2024, by July 2024 the Health & Safety team will have reviewed each plan on site with the RPO providing evidence of completion to ensure that actual compliance has been achieved so that the QLM Audit for 2023/24 can be closed, this will then be reported to the Health and Safety and Environmental Compliance Committee at its August meeting.

5. Safety Representatives Charter

- 5.1 In line with the Safety Representatives Charter agreed in June 2016, all trade unions have been offered the opportunity to complete a safety audit in 2023/24. No audits were requested/completed by Trade Unions.

6. Health and Safety Policy (revised draft)

- 6.1 During the 2023/24 external Health and Safety audits by QLM, the consultant recommended revising the HLH Health and Safety Policy to clarify the charity structure for Health and Safety.
- 6.2 The draft policy (**Appendix D**) was presented to the Health and Safety and Environmental Compliance Committee for review at its meeting on 12 February 2024 with a final draft at its meeting on 22nd May 2024, the Committee agree to present the revised draft policy to the HLH Board for approval.
- 6.3 The amendments made were as follows:
- i. the introduction and Chief Executive's statement were updated to include the charity's purpose and people values; and
 - ii. on the recommendation of QLM the current structure for Health & Safety has been added as Appendix A in the policy.

7. Implications

- 7.1 Resource Implications – there are no additional resource implications arising from this report.
- 7.2 Legal Implications - there are no additional legal implications arising from this report.
- 7.3 Equality Implications – there are no additional equality implications arising from this report.

7.4 Risk Implications – there are no new risks which require to be added to the risk register arising from this report.

Recommendations

It is recommended that Directors note:

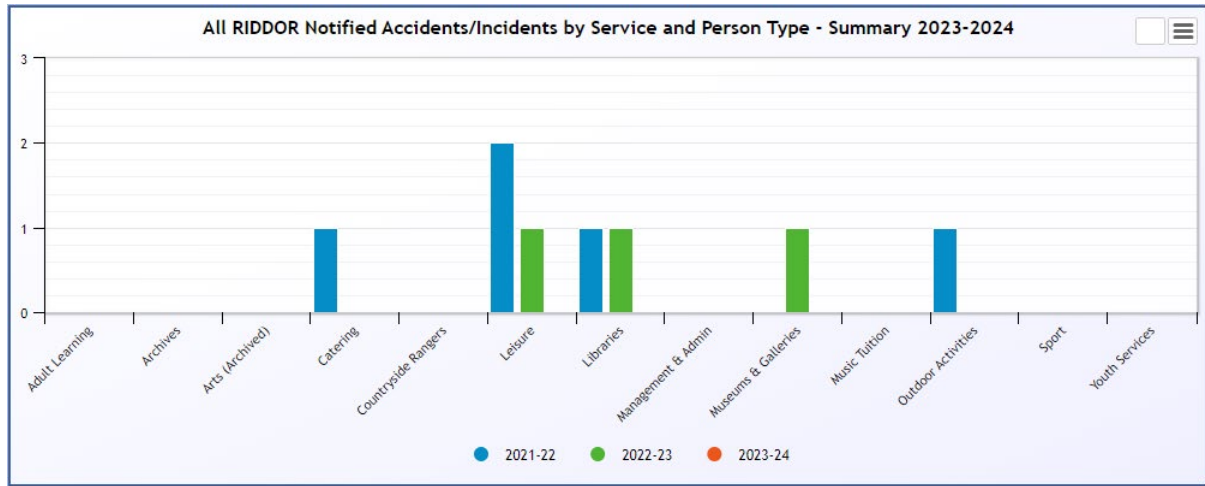
- iii. that there were no notifications for improvement or enforcement actions during the reporting period;
- iv. that there were no environmental incidents requiring SEPA notification during the reporting period;
- v. the low number and low severity of accidents or incidents over the reporting period, reflecting continuing good practice across the charity;
- vi. that the Health and Safety and Environmental Compliance Committee continues to meet quarterly with officers and the Charity's external Health and Safety advisers to review Health and Safety performance, and on reviewing the accident and incident trend data it concluded that there are no issues arising from this requiring charity-wide action;
- vii. that the external safety audit was completed by QLM during August and October 2023 with an action plan created for risk reduction;
- viii. that there were no union safety audits completed within the reporting period; and
- ix. approve the updated Health and Safety Policy in **Appendix D**.

Designation: Chief Executive

Date: 14 May 2024

Author: Craig Steedman, Head of Estates

All RIDDOR Notified Accidents/Incidents by Service and Person Type - Summary 2023-2024			
Service Area	2021-22	2022-23	2023-24
Adult Learning	0	0	0
Archives	0	0	0
Arts (Archived)	0	0	0
Catering	1	0	0
Countryside Rangers	0	0	0
Leisure	2	1	0
Libraries	1	1	0
Management & Admin	0	0	0
Museums & Galleries	0	1	0
Music Tuition	0	0	0
Outdoor Activities	1	0	0
Sport	0	0	0
Youth Services	0	0	0
Grand Total	5	3	0



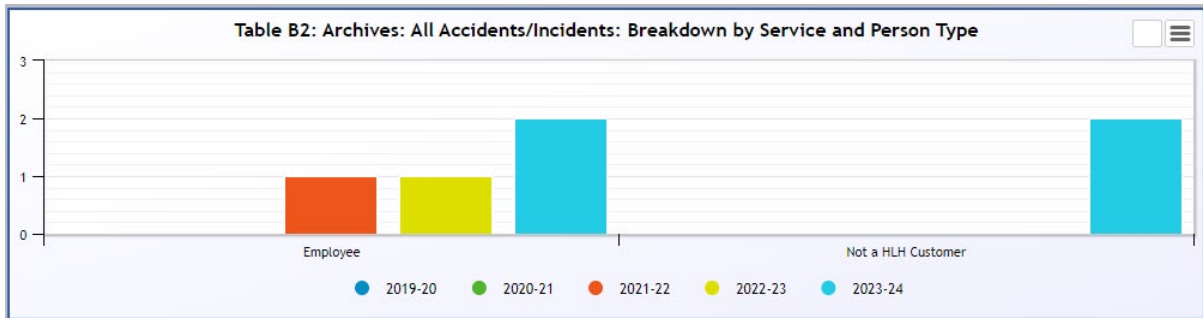
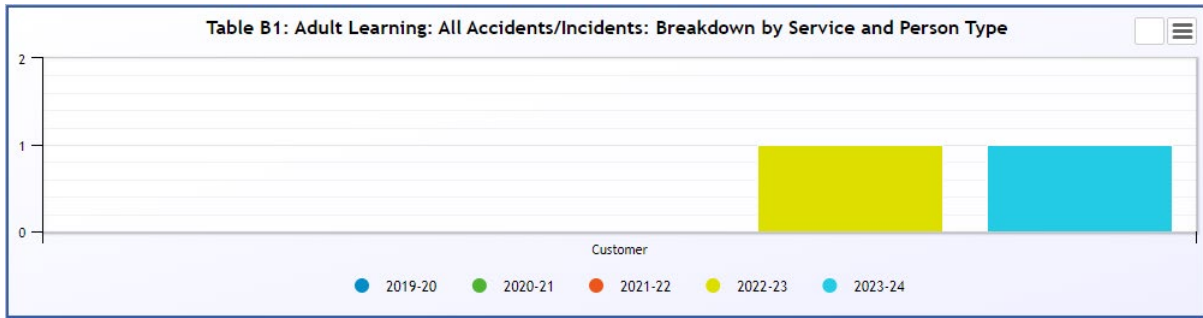
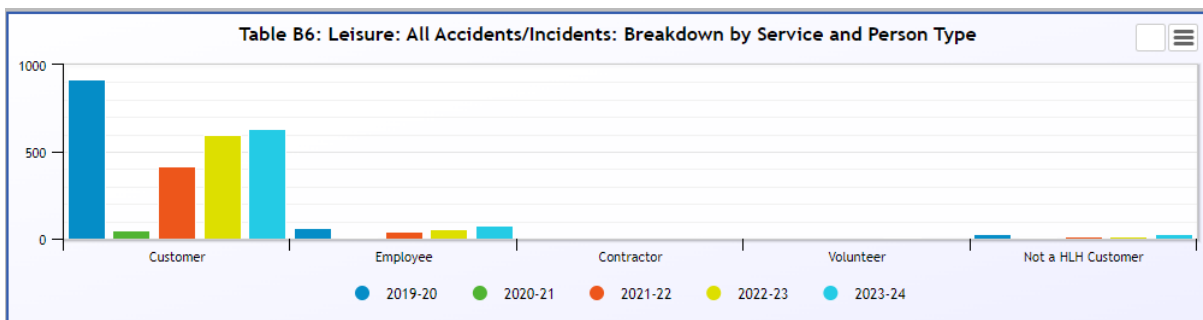
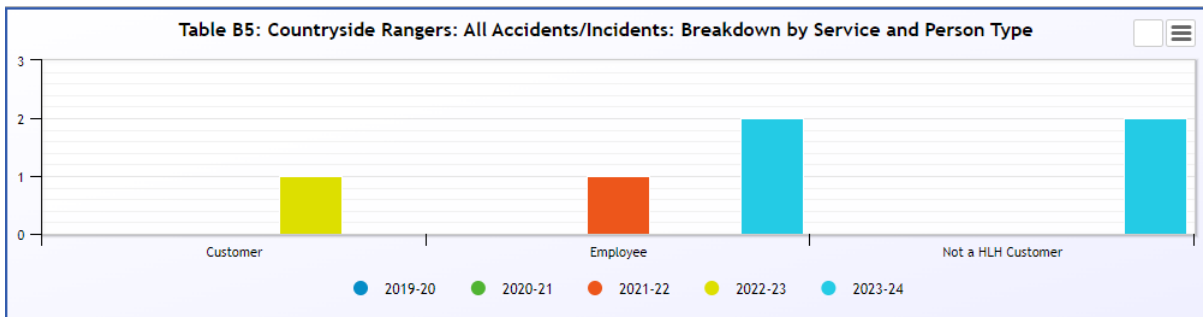


Table B3: Arts: All Accidents/Incidents: Breakdown by Service and Person Type

Person Type	2019-20	2020-21	2021-22	2022-23	2023-24
No accidents/incidents within this period.					

Table B4: Catering: All Accidents/Incidents: Breakdown by Service and Person Type

Person Type	2019-20	2020-21	2021-22	2022-23	2023-24
No accidents/incidents within this period.					



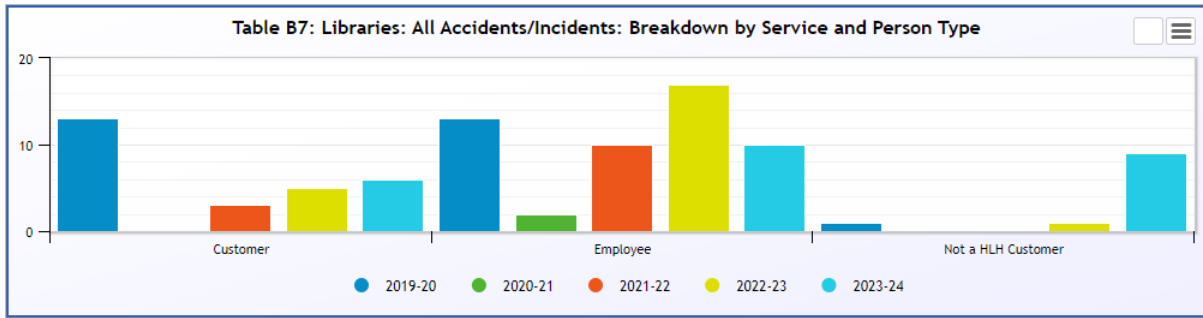


Table B8: Management & Admin: All Accidents/Incidents: Breakdown by Service and Person Type

Person Type	2019-20	2020-21	2021-22	2022-23	2023-24
No accidents/incidents within this period.					

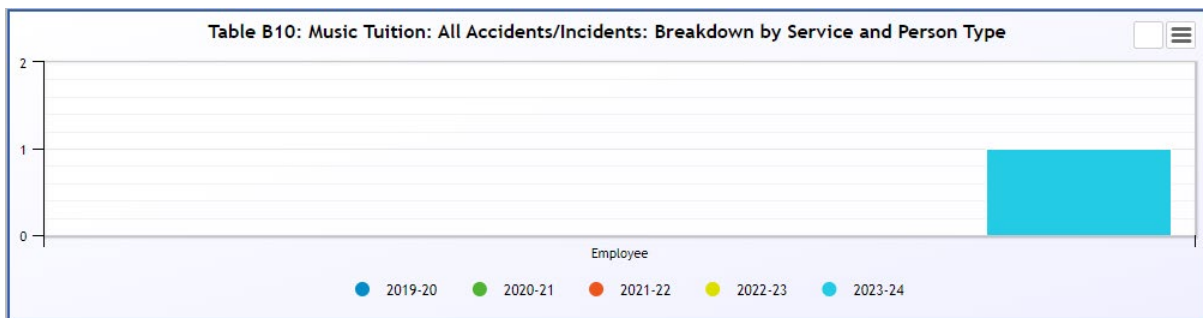
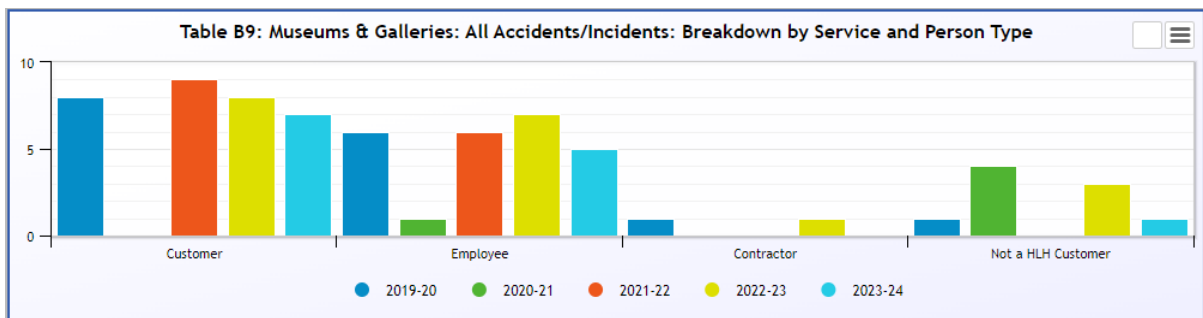
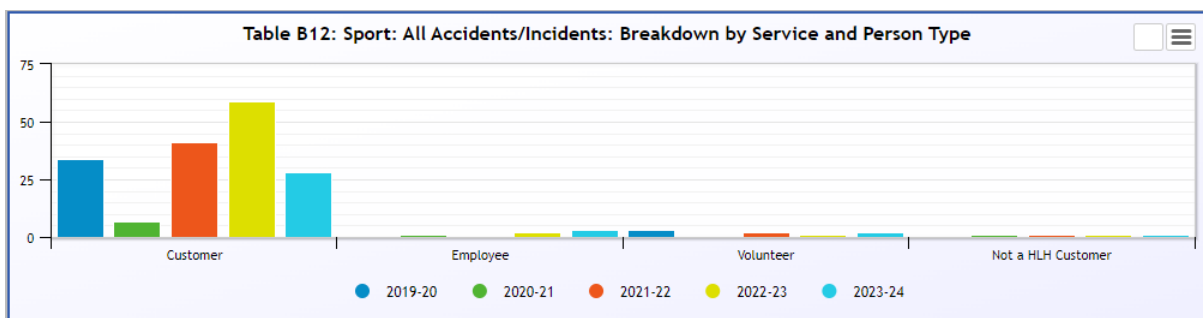
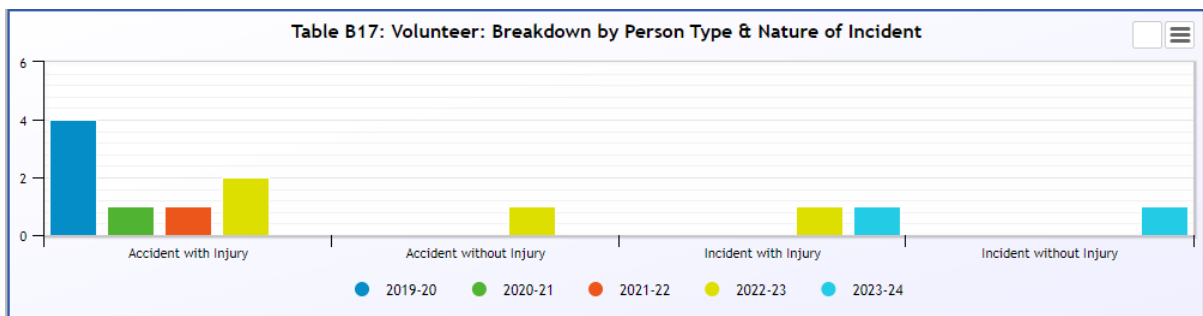
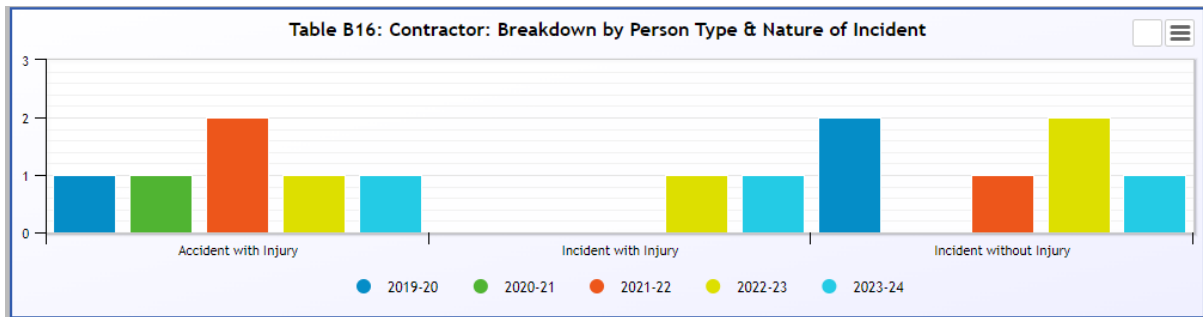
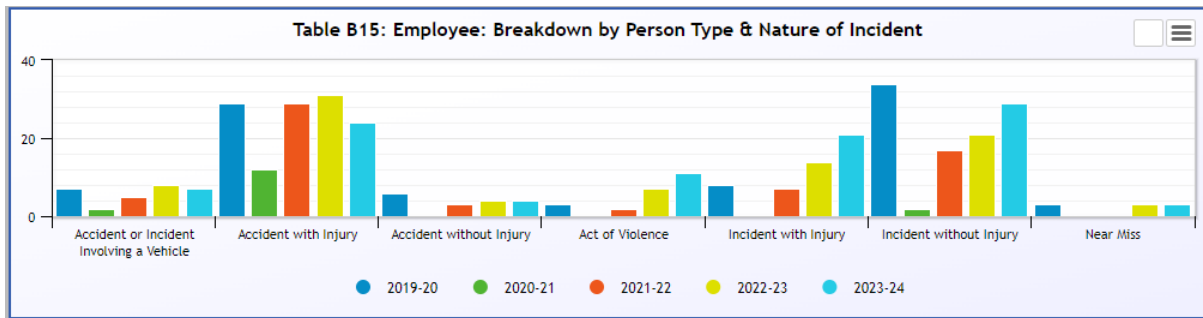
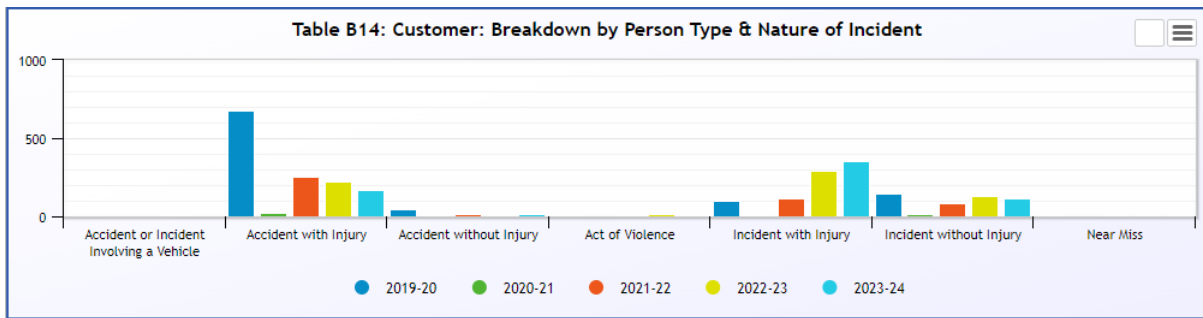
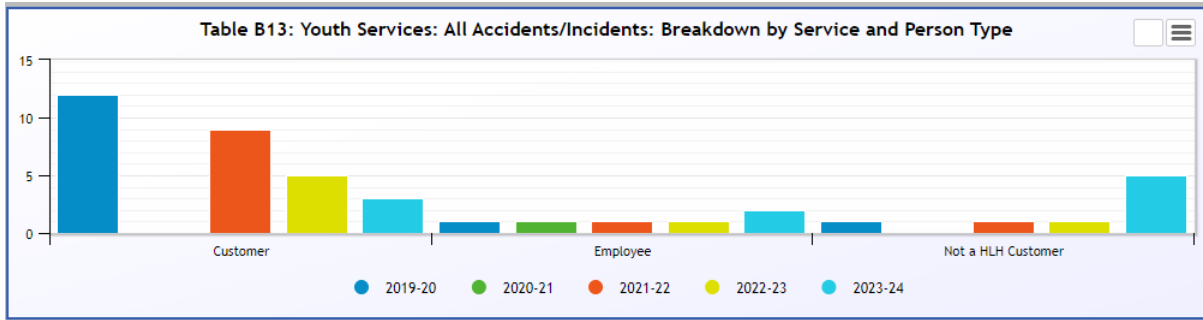
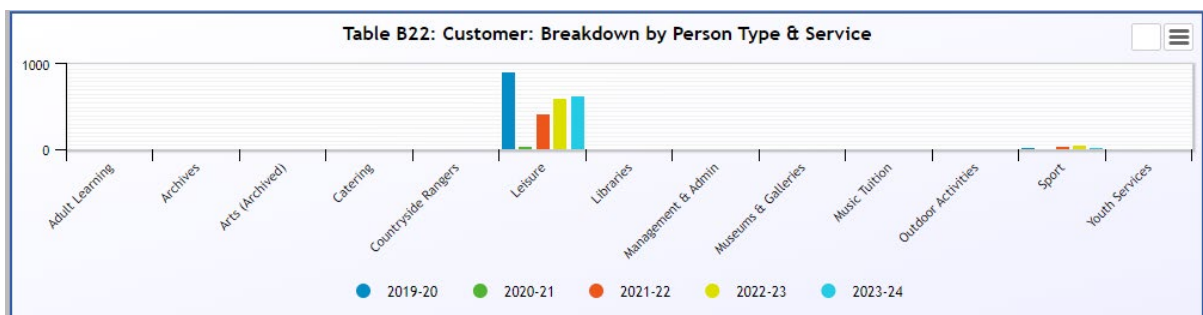
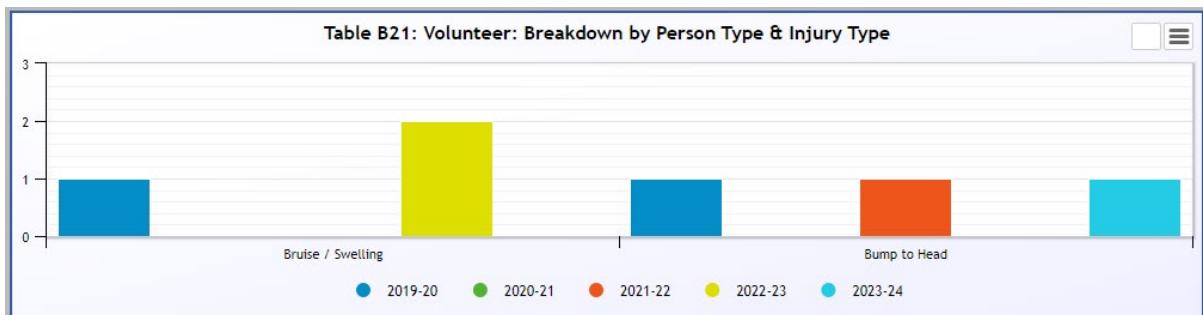
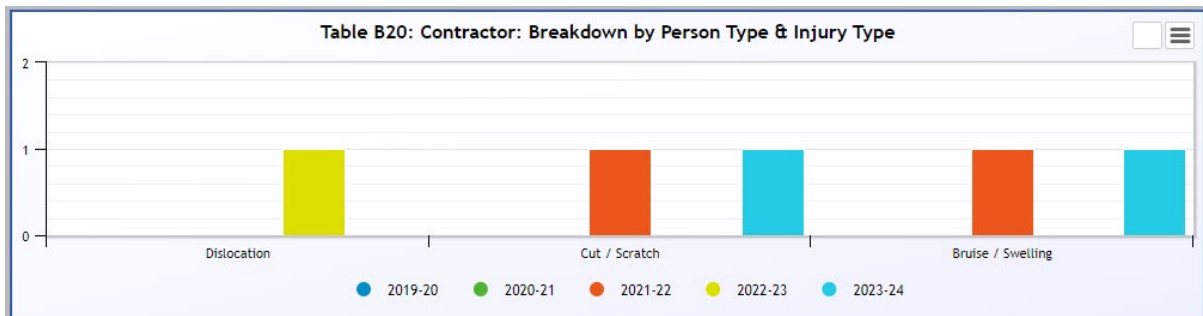
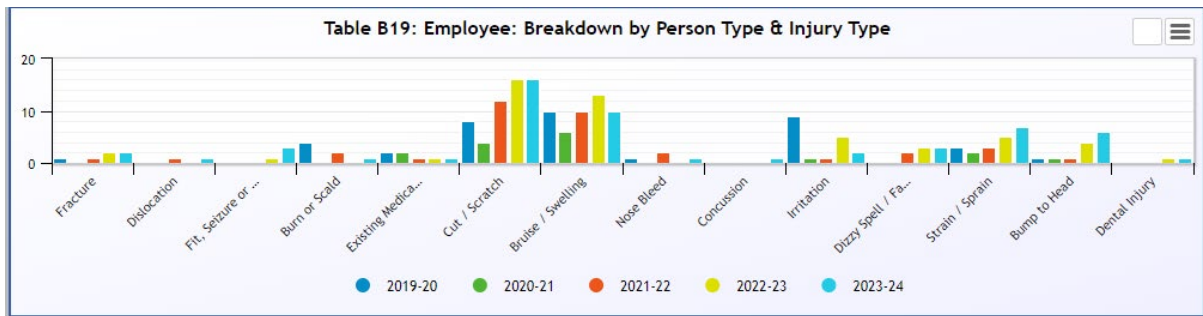
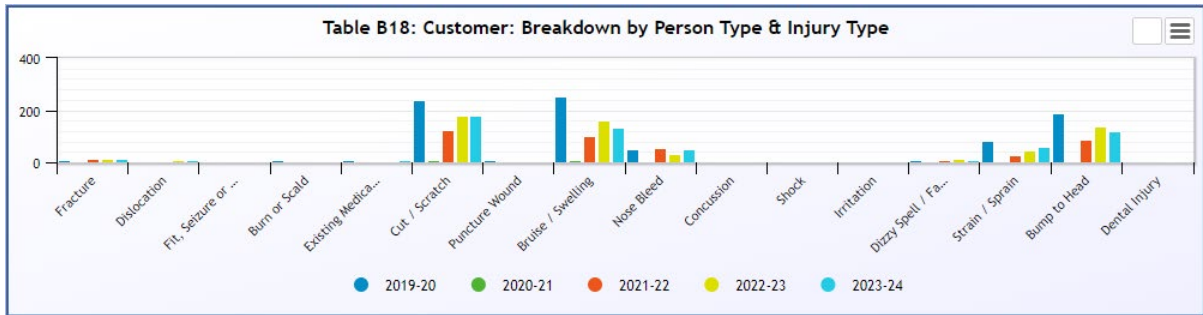


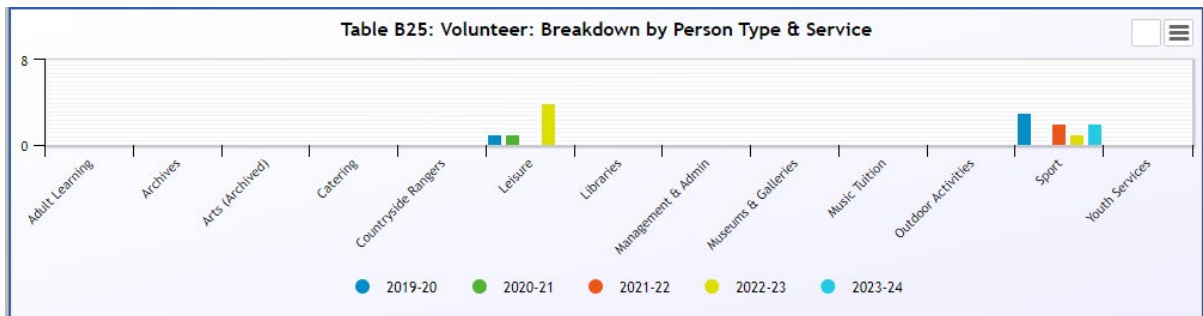
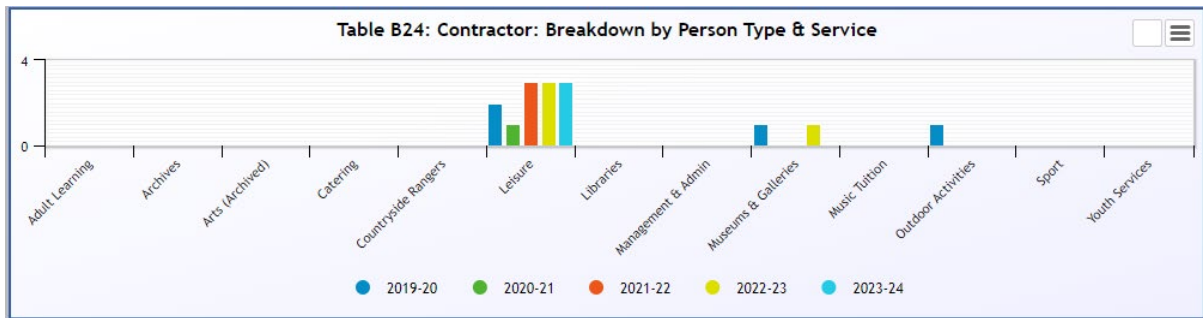
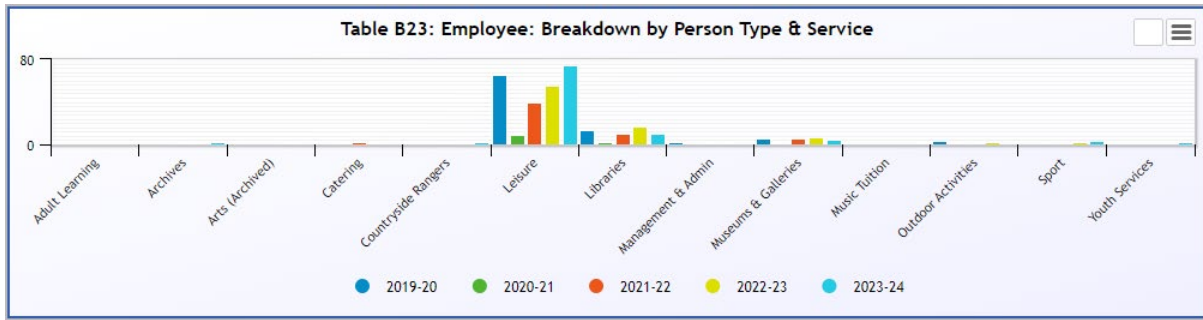
Table B11: Outdoor Activities: All Accidents/Incidents: Breakdown by Service and Person Type

Person Type	2019-20	2020-21	2021-22	2022-23	2023-24
No accidents/incidents within this period.					

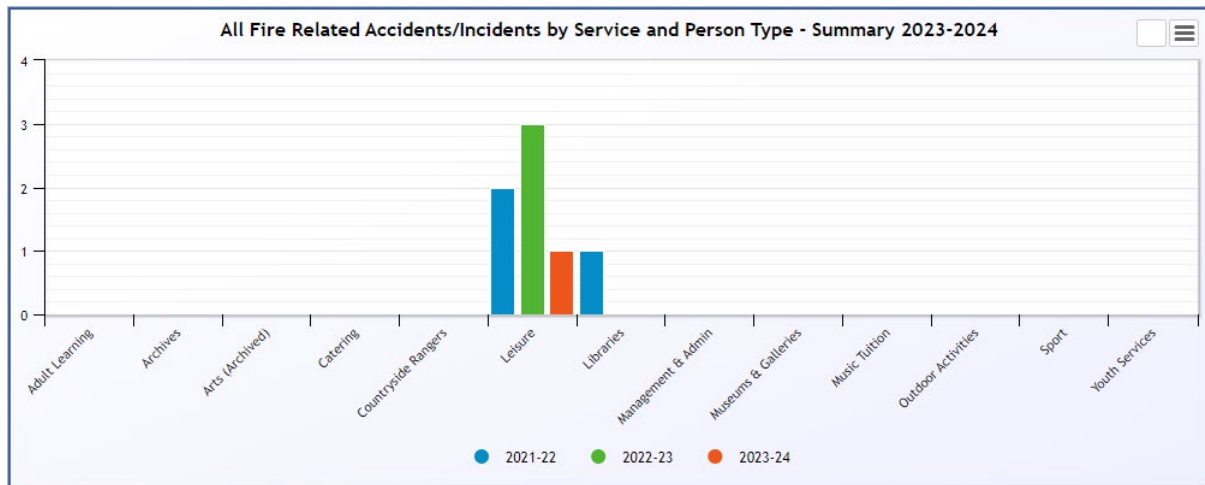








All Fire Related Accidents/Incidents by Service and Person Type - Summary 2023-2024			
Service Area	2021-22	2022-23	2023-24
Adult Learning	0	0	0
Archives	0	0	0
Arts (Archived)	0	0	0
Catering	0	0	0
Countryside Rangers	0	0	0
Leisure	2	3	1
Libraries	1	0	0
Management & Admin	0	0	0
Museums & Galleries	0	0	0
Music Tuition	0	0	0
Outdoor Activities	0	0	0
Sport	0	0	0
Youth Services	0	0	0
Grand Total	3	3	1



TITLE	Health and Safety Policy
CATEGORY	Policy
REFERENCE	HS01-P01
VERSION	10
DATE	July 2024
REVIEW DATE	July 2026

1. GENERAL STATEMENT

High Life Highland’s (HLH) purpose is ***Making Life Better*** and its people values are: ***integrity, community, accountability, respect, and example***. The organisation’s commitment to the provision of a safe and healthy workplace for its staff, volunteers, customers and contractors will make life better for everyone that it comes into contact with. HLH’s purpose and people values are core to its commitment to continually strive to improve standards of health, safety and wellbeing.

The Board of Directors, Chief Executive and management of HLH are committed to meeting their statutory duties and responsibilities under the Health and Safety at Work Act, 1974 (HASAWA), the Management of Health and Safety at Work Regulations, 1999 (MHSWR), the Fire (Scotland) Act 2005 (FSA) and all other relevant health and safety legislation. To achieve this, HLH will:

- appoint designated members of staff to be responsible for health and safety;
- keep workplace health, safety and welfare procedures under constant review;
- appoint an external Health and Safety Consultant to provide expert advice, guidance and support;
- liaise with external enforcing authorities, when necessary, such as the Local Authority and the Health and Safety Executive (HSE); and
- consult employees and their Trade Unions.

Responsibility for health and safety policy and governance lies with the Health and Safety and Environmental Compliance Committee. Any policy or alterations to this policy will be ratified by the HLH Board of Directors.

Responsibility for the implementation of the health and safety policy and associated procedures, practices and safe systems of work lies with the Chief Executive, Service Directors, Heads of Service, Managers, Officers, Supervisors, and staff. See **Appendix A** for the charity Health & Safety structure.

HLH will comply with its statutory duties under the Health and Safety at Work Act 1974 and the Management of Health and Safety at Work Regulations 1999, in so far as is reasonably practicable, through:

- the provision and maintenance of a working environment for HLH employees and volunteers that is safe and without risks to health;
- the provision and maintenance of plant and systems of work that are safe and without risks to health;
- making arrangements for ensuring safety and absence of risks to health in connection with the use, handling, storage and transportation of articles and substances;
- the provision of such information, instruction, training and supervision as is necessary to ensure the health and safety at work of employees, volunteers, customers, contractors and others;
- the maintenance of properties to ensure that their condition is safe and without risks; and

- the provision and maintenance of a means of access to and egress from properties that are safe and without risks.

All HLH employees and volunteers have a statutory responsibility to comply with their individual duties under the Health and Safety at Work Act 1974 and other health and safety legislation. Employees and volunteers are therefore expected to proactively engage with and support HLH to enable it to carry out its duties and responsibilities with regard to health and safety. Failure to comply with health and safety duties and responsibilities, regulations, work rules and procedures may be considered to be gross misconduct, and as such may be addressed through the company's disciplinary procedure.

2. ORGANISATION

2.1 Health and Safety and Environmental Compliance Committee / Board of Directors

The Health and Safety and Environmental Compliance Committee / Board of Directors has responsibility for providing leadership for health and safety compliance through:

- establishing, and reviewing the Health and Safety Policy every two years;
- monitoring health and safety performance through the annual Health and Safety Compliance Report; and
- appointing two Directors to support the work of the Health and Safety and Environmental Compliance Committee.

2.2 Chief Executive

The Chief Executive is responsible for ensuring compliance with the Health and Safety at Work Act 1974 and other associated legislation and in particular that:

- health and safety is reported to the HLH Board through an annual report (and as part of quarterly performance reports as necessary); and
- providing effective resources for the implementation of the Health and Safety Policy.

2.3 Director of Corporate Performance

The senior manager responsible for formulating and implementing policy determined by the Board is the Director of Corporate Performance. That post holder is advised and supported by a contracted health and safety specialist which will act as HLH's competent person in health and safety as is required by legislation. The Director of Corporate Performance has the following responsibilities:

- to appoint a competent specialist health and safety adviser;
- to lead the Health and Safety and Environmental Compliance Committee meetings in the absence of the Chair;
- to lead the Health and Safety Staff Group (which includes staff trade union representatives); and
- to implement and monitor the performance of the 5-year Health and Safety improvement plan.

2.4 Service Directors

The Service Directors are responsible for the overall day-to-day leadership, direction and management of health and safety for their areas of work and ensuring that all arrangements for the health and safety of customers, staff, volunteers, contractors and others affected by HLH activities are known, managed, controlled, monitored and reviewed.

The Service Directors are responsible for ensuring that:

- this Policy and any procedures that derive from it are implemented;
- suitable and sufficient risk assessments are in place and reviewed regularly or as required for all activities conducted for their areas of responsibility;
- identified risks are controlled so that they are as low as is reasonably practicable;
- there is compliance with all legal requirements;
- all staff and volunteers are competent to carry out their duties and responsibilities;
- new employees and volunteers receive a health and safety induction that includes all precautions and procedures applicable to the job activity;
- health and safety is regularly reviewed at team meetings with health and safety being a standing agenda item for all staff meetings; and
- their respective staff implement and monitor the performance of the 5-year Health and Safety improvement plan within all areas of their responsibility.

2.5 Head of Estates

The Head of Estates is responsible to the Director of Corporate Performance for:

- providing advice on health and safety management;
- managing the contract with the specialist health and safety adviser;
- managing the annual health and safety audit;
- implementing, monitoring and evaluating the performance of the 5-year Health and Safety improvement plan;
- monitoring health and safety compliance;
- monitoring the performance of the Highland Council through the Property Agreement; and
- monitoring and reporting environmental compliance incidents.
- monitor accidents and incident reporting trends;
- advise managers of their responsibilities for health, safety and welfare and any relevant legislation;
- investigate serious accidents, incidents, and dangerous occurrences;
- prepare investigation reports providing recommendations on preventing recurrence;
- provide advice on health and safety best practice;
- provide health and safety advice on the operation of new properties and the renovation, adaptation or extension of existing property;
- support the development of an appropriate health and safety training programme for employees;
- advise Managers on the display of material and publicity regarding health and safety; and
- monitor and implement the system for peer-review H&S audits.

2.6 Heads of Service

Heads of Service are accountable to their Service Directors for implementing HLH's Health and Safety Policy in their areas of operation and are responsible for:

- ensuring that risk assessments and COSHH assessments are undertaken and safe systems of work are developed and implemented;
- ensuring that Normal Operating Procedures (NOPs) and Emergency Action Plans (EAPs) are developed and implemented within each Service;

- ensuring that staff with supervisory responsibilities are properly trained and receive the support needed to carry out their duties;
- ensuring that induction training includes health and safety for all staff and volunteers;
- ensuring that accidents, incidents and dangerous occurrences are recorded and investigated;
- reporting on accidents, incidents and dangerous occurrences to the quarterly staff health and safety meetings;
- developing and implementing key actions required to achieve compliance with the spirit and themes laid out within the 5-year Health and Safety improvement plan;
- ensuring that all necessary first aid arrangements are made and maintained;
- ensuring that all necessary fire safety arrangements are made and maintained;
- ensuring that all activities carried out by HLH's employees and volunteers will not create a risk or hazard to others;
- ensuring that there are arrangements in place for liaison with contractors for all health and safety matters; and
- ensuring that any health and safety issues which cannot be resolved are raised with their Head of Service, the Principal Estates Manager and the Health and Safety and Property Officer.

2.7 Managers

All managers including Area Officers, Senior Network Librarians, Area Sports Development Officers, Network Librarians, and Facility Managers/Supervisors are responsible for:

- undertaking suitable and sufficient risk assessments;
- developing and implementing safe systems of work, Normal Operating Procedures, and Emergency Action Plans;
- ensuring that induction training for all staff and volunteers includes health and safety;
- ensuring that their staff and volunteers know and understand their responsibilities relating to health and safety;
- supporting the Heads of Service with the implementation of key actions required to achieve compliance with the spirit and themes laid out within the 5-year Health and Safety improvement plan;
- investigating all accidents, incidents and dangerous occurrences (liaising with the Health and Safety and Property Officer);
- ensuring that the arrangements which are in place for accident reporting are followed;
- ensuring that there are suitable arrangements in place for first aid;
- ensuring that there are suitable arrangements in place for fire safety management;
- ensuring that all activities carried out by HLH's employees and volunteers do not create a risk or hazard to others;
- maintaining good housekeeping standards for their section/building;
- ensuring that all employees and volunteers are adequately trained and competent to carry out the work allocated to them in a way which manages and minimises risk to themselves, other staff, volunteers, customers and contractors;
- ensuring that where health and safety training needs are identified arrangements for these are made as appropriate;
- ensuring that liaison with contractors is maintained on all health and safety matters;
- ensuring that any health and safety issues which cannot be resolved are raised with their line manager, the Principal Estates Manager or the Health and Safety and Property Officer; and
- Ensuring that regular exercises are undertaken to test contingency plans (e.g. fire exercises).

2.8 Persons with Supervisory Responsibility

Persons with supervisory responsibilities are responsible to their line manager for the following:

- day-to-day implementation of HLH's Health and Safety Policy,
- contributing to the development of risk assessments and safe systems of work;
- implementing safe systems of work, Normal Operating Procedures and Emergency Action plans;
- the introduction of remedial measures to reduce or eliminate unsafe acts or conditions;
- providing employees and volunteers with information about hazardous substances and precautions;
- providing employees and volunteers with information, instruction, training and supervision in safe methods of work; and
- carrying out initial investigations into accidents, incidents and dangerous occurrences.

3. EMPLOYEES AND VOLUNTEERS

It is the responsibility of all employees and volunteers to ensure that:

- they are fully conversant with this Policy and co-operate with HLH in meeting its statutory duties;
- they take reasonable care of themselves and others who may be affected by their acts or omissions;
- all accidents, incidents and dangerous occurrences are immediately reported to their line manager;
- they are fully conversant and comply with all safe systems of work, Normal Operating Procedures and Emergency Action plans;
- equipment provided for personal safety is used and maintained in a condition fit for use, and any defects immediately repaired or reported to their line manager; and
- they report to their line manager any unsafe systems of work which develop contrary to instructions or result in unsafe working conditions, and/or damage to plant, machinery or equipment.

4. HEALTH AND SAFETY SPECIALIST ADVISER

The health and safety specialist adviser is responsible for:

- supporting and advising HLH on its Health and Safety Compliance and associated policy, guidance and procedures;
- providing guidance on documentation and systems related to health and safety management;
- providing specialist advice;
- attending Health and Safety and Environmental Compliance committee and staff/trade union health and safety meetings;
- auditing health and safety activity; and
- supporting HLH with accident investigations, criminal or civil proceedings, and liaising with enforcing authorities.

5. HEALTH AND SAFETY SUPPLEMENTARY GUIDANCE

Further guidance on procedures and specific issues are maintained on the HLH staff website.

6. HIGH LIFE HIGHLAND CHIEF EXECUTIVE COMMITMENT STATEMENT

High Life Highland (HLH) is a charity registered in Scotland and a Company, Limited by Guarantee, wholly owned by The Highland Council (THC) to deliver services on its behalf. HLH's purpose is Making Life Better and this is supported by our people values of integrity, community, accountability, respect and example.

The organisation has many staff, volunteers and customers, accessing and delivering activities across a large geographic area and in many individual sites and types of buildings. HLH is committed to ensuring an environment that is as safe and secure as is reasonably practical whilst recognising that risk management is a key activity for the organisation. A safe and secure environment will be created and maintained by an adherence to this policy, and HLH will strive to continually improve its standards of health, safety and wellbeing.

HLH will undertake to provide suitable and sufficient health and safety training and information to all employees and volunteers to enable them to improve their knowledge and awareness of health and safety and to discharge their health and safety responsibilities.

It is important for all personnel, whatever their position, to accept their personal responsibilities, as detailed in the policy and procedures, with active co-operation between management and employees being essential to promote a safe and healthy environment for ourselves and our customers.

Finally, HLH undertakes to review and revise the policy as often as is required by changing legislation. All changes will be brought to the attention of all employees.

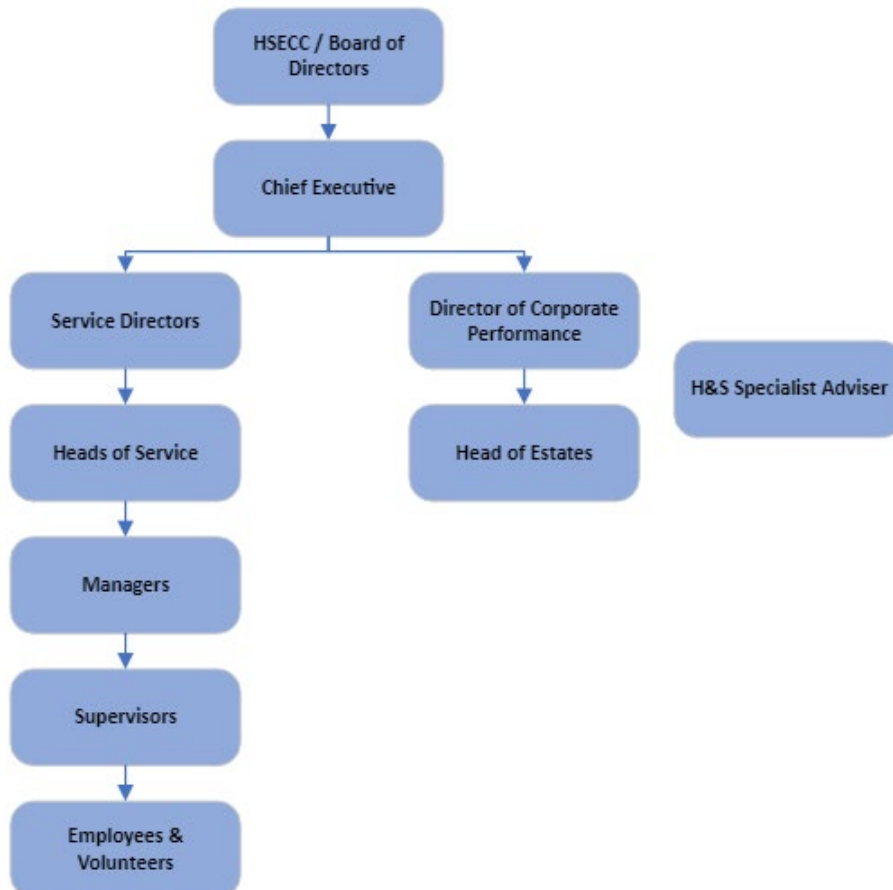
This policy has been signed by:

Steve Walsh OBE
Chief Executive
High Life Highland
July 2024

A copy of the signed policy is held at High Life Highland HQ

Appendix A

Charity structure for Health & Safety



Version history

Version	Title	Status*	Date	Notes
1	Health and Safety and Environmental Compliance Policy	Created	1 October 2011	
2	<i>As above</i>			
3	<i>As above</i>			
4	<i>As above</i>			
5	<i>As above</i>			
6	<i>As above</i>			
7	<i>As above</i>			
8	Health and Safety Policy – Approved by the HLH Board on 31 st March 2022	Update	Live from April 2022	Reformatted and replaced 'Principal Managers' with 'Heads of Service', changed from H&S&EC Policy to H&S Policy
9	Health and Safety Policy – Approved by the HLH Board on 14 th March 2023	Update	Live from April 2023	Updated to explicitly include volunteers
10	Health and Safety Policy – Draft for HLH Board June 2024	Update	Draft – to go live July 2024	Review, removal of the Health & Safety & Property Officers position, Add - Appendix A and Making Life Better

*Status Key

Created = a new policy

Updated = previous version retained with amendments/additions

Reviewed = existing version considered to need no amendments/additions

Archived = No longer required