



COTSWOLD

District Council

Council name	COTSWOLD DISTRICT COUNCIL
Name and date of Committee	CABINET – 10 SEPTEMBER 2026
Subject	HEALTH AND SAFETY DELEGATED RESPONSIBILITY FRAMEWORK
Wards affected	None
Accountable member	Cllr Mike Every, Leader of the Council Email: mike.every@cotswold.gov.uk
Accountable officer	Claire Locke, Executive Director for Corporate Services Email: Claire.locke@publicagroup.uk
Report author	Amy Kemmett, Health and Safety Business Partner Email: amy.kemmett@publicagroup.uk
Summary/Purpose	Submit the Health and Safety Delegated Responsibility Framework to the Cabinet for approval.
Annexes	Annex A – C-HSP-001-01 Policy Implementation Framework Annex B – Health & Safety Policy Approval Process Annex C – Sustainability Impact Assessment
Recommendation(s)	That Cabinet resolves to: • Approve the implementation of the attached Health and Safety Delegated Responsibility Framework. • Delegate authority to the Chief Executive Officer to approve health and safety policies in line with the Framework attached.
Corporate priorities	N/A
Key Decision	NO
Exempt	NO



COTSWOLD

District Council

Consultees/ Consultation	Consultation has been undertaken with Publica Executives, the Corporate Health and Safety Team, and senior officers across the partnership. The framework also sets out future consultation arrangements for health and safety policy development, including proportionate engagement with Executive Leadership Teams, Health and Safety Committees, Trade Union representatives, Legal, Data Protection and Equality Leads where relevant.
-----------------------------	---



1. EXECUTIVE SUMMARY

- 1.1** To support effective health and safety governance across services delivered through Publica on behalf of Cotswold District Council, a review has identified the need for a consistent and proportionate framework for the development, approval and implementation of health and safety policies.
- 1.2** The Health and Safety Delegated Responsibility Framework establishes a clear governance route for health and safety policies, enabling the Chief Executive Officer to approve policies under delegated authority where appropriate, while ensuring that matters are escalated to Cabinet where required by legislation, constitutional requirements, financial significance, legal implications, political sensitivity or public interest.
- 1.3** The framework supports a more efficient and timely policy approval process, ensuring that health and safety policies remain current, legally compliant and responsive to changes in legislation, operational practice and best practice guidance. It also provides assurance that Cabinet retains strategic oversight through exception reporting and by-exception decision-making where escalation criteria are met.
- 1.4** Approval of this framework will provide clarity for officers, elected members and services by defining policy categories, approval routes, consultation requirements, publication arrangements, monitoring, review and audit expectations. This will strengthen accountability and support consistent health and safety standards across Cotswold District Council.

2. BACKGROUND

- 2.1** The current process for developing and approving health and safety policies would benefit from greater clarity and consistency. Health and safety policies are required to set out mandatory standards, responsibilities and arrangements to ensure that Cotswold District Council complies with their statutory duties as an employer, service provider and, where applicable, landlord.
- 2.2** The health and safety management system is being developed to provide a structured suite of documents, including policies, procedures, guidance, templates and management arrangements. This will support compliance with health and safety legislation and ensure that employees, councillors, contractors, tenants, visitors and



members of the public remain safe when on council premises, working on council business or engaging with council services.

- 2.3** Historically, health and safety policies have often required Cabinet approval. While this remains appropriate for matters with significant strategic, legal, financial or political implications, not all health and safety policies require this level of approval. In many cases, policies are technical documents designed to implement statutory duties and operational controls. Requiring Cabinet approval for all such documents can delay implementation and increase the risk that policies do not remain current in response to changes in legislation, regulatory expectations, audit findings or incident learning.
- 2.4** The Delegated Responsibility Framework has therefore been developed to establish a transparent and accountable approach to health and safety policy approval. It enables policies to be approved at Corporate Leadership Team or senior officer level where constitutionally appropriate, while ensuring escalation to Cabinet where specific criteria are met.
- 2.5** The framework operates within the Council's Constitution and Scheme of Delegation. Where the Constitution requires Cabinet or Executive approval, that route will take precedence. The Constitution can be found at [The Council's Constitution - Cotswold District Council](#).

3. HEALTH AND SAFETY DELEGATED RESPONSIBILITY FRAMEWORK

- 3.1** The framework introduces three levels of health and safety documentation:
- Level 1 – Corporate Health and Safety Policies:** organisation-wide principles and mandatory requirements, approved by relevant Council Corporate Leadership Teams under delegated authority.
- Level 2 – Topic Procedures:** operational methods for implementing policy requirements for specific risks, approved by CLT or a delegated Director/Head of Service as defined locally.
- Level 3 – Guidance and Toolkits:** good practice advice and templates that support implementation and do not change mandatory controls, approved by the Document Owner's Head of Service.



3.2 It includes a Health and Safety Management System diagram as Appendix 1 to Annex A, which supports the overall structure of the framework and demonstrates how the delegated responsibility arrangements fit within the broader health and safety governance system. A process diagram of the practical approval process can be found at Annex B.

4. ALTERNATIVE OPTIONS

4.1 An alternative option would be to continue requiring all health and safety policies to be approved through Cabinet approval routes. However, this approach would not provide a proportionate approval process for technical or operational health and safety documents and may delay the implementation of policies required to support statutory compliance.

5. CONCLUSIONS

5.1 The recommended approach is therefore to adopt the Delegated Responsibility Framework. This provides a balanced governance model that supports timely decision-making, maintains Cabinet oversight where required, and ensures that health and safety policies remain legally compliant, proportionate and consistently managed

6. FINANCIAL IMPLICATIONS

6.1 There are no direct financial implications arising from the approval of this framework.

6.2 The framework is designed to support more efficient governance and approval arrangements for health and safety policies. It does not, in itself, introduce new operational controls or require additional expenditure. Where individual health and safety policies developed under this framework have financial implications, these will be identified and considered as part of the relevant policy development and approval process.

6.3 The framework also provides that the Monitoring Officer and Section 151 Officer will provide advice on legal, constitutional and financial implications where relevant.



7. LEGAL IMPLICATIONS

- 7.1** Cotswold District Council and Publica have statutory duties under health and safety legislation, including the Health and Safety at Work etc. Act 1974 and the Management of Health and Safety at Work Regulations 1999. Additional duties may also apply under legislation relating to premises, work equipment, manual handling, substances hazardous to health, accident reporting, fire safety and landlord responsibilities.
- 7.2** This framework supports compliance with these duties by ensuring that health and safety policies are developed, approved, implemented and reviewed through a clear, consistent and auditable governance process.
- 7.3** Failure to maintain suitable health and safety policies and governance arrangements could result in inconsistent standards, delayed implementation of necessary controls and increased risk of non-compliance with statutory duties. This may expose the Council to enforcement action, civil claims, reputational damage and increased risk to employees, contractors, visitors, tenants and members of the public.

8. RISK ASSESSMENT

- 8.1** Without a clear delegated responsibility framework, there is a risk that health and safety policies may be subject to inconsistent approval routes, delayed implementation or insufficient oversight. This could affect the Council's ability to respond promptly to legislative change, incident learning, audit findings or changes in operational practice.
- 8.2** The framework reduces this risk by establishing a documented approach for policy development, consultation, approval, publication, communication, implementation, review and audit. It also ensures that escalation to Cabinet is required where the policy has significant financial, legal or political implications, where legislation or the Constitution requires Cabinet approval, or where the Corporate Leadership Team or Monitoring Officer considers Cabinet approval appropriate.
- 8.3** The framework further strengthens assurance by requiring a central register of health and safety policies, exception reporting of overdue reviews and high-priority actions, and the potential use of internal audit or peer review to assess compliance with the framework.



9. EQUALITIES IMPACT

- 9.1** The framework requires equality considerations to be applied proportionately to Level 1 and Level 2 health and safety documents, as described above in 3.3, with any required mitigations identified as part of policy development and implementation.

10. CLIMATE AND ECOLOGICAL EMERGENCIES IMPLICATIONS

- 10.1** The implementation of this framework is not expected to have any direct climate, biodiversity or ecological emergency implications.
- 10.2** The framework relates to the governance, approval and implementation of health and safety policies. Where individual health and safety policies developed under this framework have sustainability, environmental or ecological implications, these will be considered as part of the relevant policy development and approval process.
- 10.3** A Sustainability Impact Assessment is to be found at Annex C.

11. BACKGROUND PAPERS

- 11.1** There are no background papers.