



Title: C-HSP-001-01 Health & Safety Delegated Responsibility Framework

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Date: August 2026

Approved By:

Review Date: September 2027

Version	Status	Date	Reviewer	Purpose/outcome
1.0	Draft	05/08/2026	Corporate Health & Safety Team	Draft Specific to Cotswold District Council for Cabinet Approval

1. Purpose

The framework establishes a consistent approach to the development, approval and implementation of health and safety policies across services delivered through Publica on behalf of partner councils. It enables the Corporate Leadership Team to approve policies under delegated authority, with escalation to Elected Members where required by legislation, constitutional requirements or defined criteria.

The framework supports effective governance by streamlining approval processes, ensuring compliance with statutory duties, and enabling timely adoption of policies in response to legislative, operational and best practice changes. It also clarifies roles and responsibilities for policy development and approval, ensuring appropriate oversight, accountability and assurance.

In doing so, it supports the provision of safe and healthy environments for employees, contractors and others affected by service delivery, while allowing councils to retain flexibility to reflect local priorities within an aligned health and safety framework.

2. Statement of Intent

Publica and Cotswold District Council are committed to maintaining high standards of health and safety governance. This framework ensures that policies are developed, approved and implemented in a consistent, efficient and compliant manner, supporting operational needs while protecting the health, safety and wellbeing of employees, contractors, visitors and others affected by service delivery.

The framework is intended to enable delegated decision-making at Corporate Leadership Team level, supported by clear escalation arrangements, proportionate consultation, and robust assurance processes. It ensures compliance with legal and constitutional requirements, while allowing policies to remain current, practical and responsive to change.

Accountability and Governance

The Corporate Leadership Team will exercise delegated authority in accordance with this framework, recording decisions through established governance arrangements. Cabinet retain strategic oversight through assurance reporting and by-exception decision-making where escalation criteria are met.

The Monitoring Officer and Section 151 Officer will provide advice on legal, constitutional and financial implications as required. All approved policies will be recorded in a central register, including version control and review arrangements.

This framework operates within Cotswold District Council's Constitution and Scheme of Delegation. Where these require Cabinet approval, that route will take precedence.

3. Scope

This framework applies to the development, review and approval of health and safety policies across all services delivered by Publica and Cotswold District Council. It includes corporate policies that define principles, standards and arrangements for managing risk and complying with statutory duties.

Included within scope:

- Corporate health and safety policies applicable across Cotswold District Council's operations
- Policies addressing specific operational risks (e.g. statutory compliance, lone working, workplace safety)
- Revisions and updates to existing health and safety policies

Excluded from scope:

- Statutory plans or strategies that require full Council approval under legislation.
- Policies outside the remit of health and safety (e.g., HR, finance, or environmental policies unless they directly impact health and safety).

4. Definitions

To ensure clarity and consistency, the following terms are defined for the purpose of this framework:

Framework - A governance document setting out the principles, processes and accountability arrangements for the development, approval and implementation of health and safety policies.

Policy - A formal statement establishing the principles, standards and mandatory requirements for managing health and safety risks and ensuring compliance with legislation.

Corporate Leadership Team - Senior officers with delegated authority to approve health and safety policies, including responsibility for ensuring policies are appropriate, compliant and aligned with operational needs.

Cabinet - Elected members responsible for strategic oversight. Cabinet retains accountability through assurance arrangements and by-exception decision-making where escalation criteria are met.

Delegated Authority - The formal transfer of decision-making powers enabling policies to be approved without requiring full Council approval, in accordance with each council's constitution.

Partnership Councils - The councils receiving services through Publica. Each retains autonomy and may adapt policies to reflect local operational requirements.

Health and Safety Policy - A document setting out the organisation's approach to managing health and safety risks, including responsibilities, arrangements and compliance requirements. Policies may be corporate or council specific.

Governance Framework - The systems and processes ensuring policies are developed, approved and implemented in a transparent, accountable and compliant manner.

5. Legislative & Governance Context

This Framework is underpinned by statutory requirements and governance arrangements that ensure health and safety policies are legally compliant, transparent and subject to appropriate oversight.

Legislative Context

Cotswold District Council and Publica have duties arising from their roles as employers and, where applicable, landlords. Key legislation includes:

- Health and Safety at Work etc. Act 1974
- Management of Health and Safety at Work Regulations 1999
- Workplace (Health, Safety and Welfare) Regulations 1992
- Provision and Use of Work Equipment Regulations 1998 (PUWER)
- Manual Handling Operations Regulations 1992
- Control of Substances Hazardous to Health Regulations 2002 (COSHH)
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)
- Fire Safety (Regulatory Reform) Order 2005

Where landlord responsibilities apply, additional duties include:

- Landlord and Tenant Act 1985 and Homes (Fitness for Human Habitation) Act 2018
- Gas Safety (Installation and Use) Regulations
- Electrical Safety Standards in the Private Rented Sector Regulations 2020
- Fire Safety (England) Regulations 2022

These requirements ensure risks are managed to protect employees, tenants, contractors and others affected by service delivery.

Governance Context

Health and safety policy approval operates within established local government governance arrangements, including:

- Local Government Act 1972 and 2000
- Council Constitutions
- Publica Governance Framework

This framework operates within these legislative and governance parameters to ensure that health and safety policies are:

- Legally compliant.
- Approved through a transparent and accountable process.
- Consistent in approach while allowing for local operational requirements

6. Roles and Responsibilities

This framework defines clear ownership to ensure accountability and timely decision-making

Corporate Leadership Team – exercise delegated authority to approve health and safety policies, ensure legal compliance, record decisions through established governance routes and commission implementation.

Document Owner – Ownership and overall responsibility for all health and safety policies within this framework sits with the Corporate Health and Safety Team.

Corporate Health and Safety Team – provides technical advice, quality assurance, consistency across policy development, and maintains the central register of policies.

Monitoring Officer and Section 151 Officer – Statutory Council roles which advise on legality, constitution and financial implications where relevant.

Trade Union and staff representatives – consulted proportionately through the Health and Safety Committee and routine engagement channels.

Managers – implement approved policies in their services, brief teams and confirm any local procedures needed to comply.

All employees and contractors – follow approved policies and report any issues or improvement opportunities.

7. Document Categories and Approved Routes

To promote consistency and proportionality, documents are grouped and approved as follows.

Level 1 – Corporate Health and Safety Policies: set organisation wide principles and mandatory requirements.

Approver: Council Corporate Leadership Teams under delegated authority.

Level 2 – Topic Procedures: operational methods that implement policy requirements for specific risks (for example, lone working, manual handling).

Approver: CLT or 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.

Approver: Document Owner's Head of Service.

8. Development, Consultation and Assurance

Policies and procedures will be developed through a proportionate and auditable process.

Drafting – the Document Owner prepares the draft using the agreed template, aligning with legal duties and current best practice.

Consultation – proportionate engagement with the Health and Safety Committee, Trade Union representatives, Legal, Data Protection and Equality Leads where relevant.

Technical assurance – To support quality and technical assurance, all documentation will be independently reviewed and cross-checked by other members of the Health and Safety Team. Finalisation – consultation feedback and assurance comments are recorded, with rationale for acceptance or nonacceptance, before submission for approval.

9. Escalation to Cabinet

Most health and safety policies are approved under delegated authority. Escalation to Cabinet is required where:

- Legislation or Council constitution explicitly requires Cabinet approval.
- The policy has significant financial, legal or political implications that exceed CLT delegations.
- The CLT or Monitoring Officer considers Cabinet approval appropriate due to the sensitivity or public interest.
- Escalation decisions will be documented with reasons and, where time-critical, may follow an urgent decision route in line with each Council's Constitution.

10. Publications, Communication and Implementation

Approved documents will be accessible, communicated and embedded effectively.

Publication & Access

Approved policies will be published in a single, read-only location on the staff intranet as the definitive source, with consistent naming, version control and defined ownership. Superseded versions will be archived, and documents will meet accessibility requirements.

Go-Live Criteria

Policies may go live once approval has been recorded, publication arrangements are in place, key messages and audiences identified, and any supporting materials or dependencies updated. An appropriate effective date will be set to allow for communication and implementation.

Communication

Communication will be proportionate to the impact of the policy and will ensure that relevant stakeholders are informed of key changes, responsibilities and actions required. Appropriate channels will be used, supported by clear messaging and, where necessary, briefing materials.

Manager Briefing and Local Implementation

Managers will ensure policies are communicated within their services and that any required local arrangements, including updates to risk assessments or procedures, are implemented. Issues affecting implementation will be escalated as required.

Implementation Responsibilities

- Document Owner – coordinates implementation, communication and readiness for go-live
- Corporate Health and Safety Team – provides guidance, assurance and maintains the central register
- Communications – supports delivery of proportionate communications
- Managers – implement and confirm completion of required actions
- Contractors/Partners – receive and comply with relevant policies as required

Document Control and Retention

Superseded materials will be withdrawn from use, and relevant records relating to approval, communication and implementation will be retained in accordance with organisational requirements.

11. Review and Continuous Improvement

Policies will be maintained to ensure they remain current, practical and effective.

Review cycle – maximum review periods will apply based on policy level:

- Level 1 – every two years
- Level 2 – every two to three years
- Level 3 – up to three years

Reviews may be brought forward following legislative change, incident learning, audit findings or organisational change.

Continuous improvement – feedback from services, audits, incidents and user queries will be captured and considered as part of scheduled reviews or, where necessary, through interim updates.

Version control – each policy will include document ownership, approval, effective date, next review date and a summary of changes.

12. Monitoring, Reporting and Audit

Assurance is maintained through routine monitoring and transparent reporting arrangements.

- **Central register** – the Corporate Health and Safety Team maintains a register of all health and safety policies, including ownership, approval and review status.
- **Exception reporting** – overdue reviews and high-priority actions are reported to Executive Leadership Teams on a quarterly basis and, by exception, to Cabinets through existing governance arrangements.
- **Audit** – internal audit or peer review may be used to assess compliance with this framework, including the accuracy of the register, publication status and evidence of implementation.

13. Records and Retention

Governance records will be retained in line with organisational information management requirements.

Drafting materials, consultation feedback, assurance records, approval records and publication logs will be stored in the designated repository.

Superseded policy versions will be retained with version history and withdrawal rationale.

Retention of records will comply with each council's retention schedule, ensuring documents remain accessible for audit and legal purposes.

14. Urgent Updates and Exceptions

Where necessary, expedited arrangements may be used to address legal changes or immediate risks.

Urgent updates – the CLT Chair or a nominated Director may approve urgent changes under existing delegated authority. Decisions will be recorded and reported to the Executive Leadership Team and, where required, to Cabinet at the next available meeting.

Temporary exceptions – where full compliance is temporarily impracticable, a Director may authorise a time-limited exception, supported by a documented risk assessment and appropriate control measures. This will be undertaken in consultation with the Corporate Health and Safety Team and, where appropriate, the Monitoring Officer.

15. Equality, Privacy and Accessibility

Policy development and implementation will consider equality, data protection and accessibility requirements.

Equality – proportionate equality impact considerations will be applied to Level 1 and Level 2 documents, identifying any required mitigations.

Privacy – where policies involve the processing of personal data, the Document Owner will ensure compliance with data protection requirements and confirm any necessary privacy notices.

Accessibility – policies will be written in clear language and made available in accessible formats.

16. Consistency and Local Adaption

This framework supports local flexibility while maintaining consistency in the application of health and safety policies.

Where local operational needs require, councils may implement local procedures or appendices, provided these do not weaken or conflict with mandatory controls.

The Corporate Health and Safety Team will identify opportunities to align policies across councils to reduce duplication and improve clarity.

Appendix One – Health and Safety Management System Diagram



