

# The BBC's Organisation and Arrangements for the Management of Health and Safety

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# 1 INTRODUCTION

This document sets out the organisation and arrangements by which the BBC manages health and safety across the organisation. It was formally approved by the BBC Safety Committee on 15 October 2009.

The BBC Safety Committee agrees that the Head of Policy and Compliance, BBC Safety may make minor amendments to this document without obtaining formal approval from the Committee. Any amendment that has, or is likely to have, a significant operational or health and safety impact on the organisation, or parts of the organisation, will require formal approval by the Committee.

## **2 SCOPE OF THE ORGANISATION AND ARRANGEMENTS**

### **2.1 Scope of the system**

The management system applies to:-

- all BBC employees undertaking BBC activities in the UK,
- freelances/contractors whilst undertaking, or engaged in, BBC activities where specified by contract in the UK
- all BBC employees overseas in so far as it is reasonably practicable, but as a minimum achieving compliance with local legislation
- freelances/contractors overseas in so far as it is reasonably practicable whilst undertaking, or engaged in, BBC activities where specified by contract, but as a minimum achieving compliance with local legislation

The system does not directly apply to subsidiaries, whether partially or wholly owned, unless agreed by both parties.

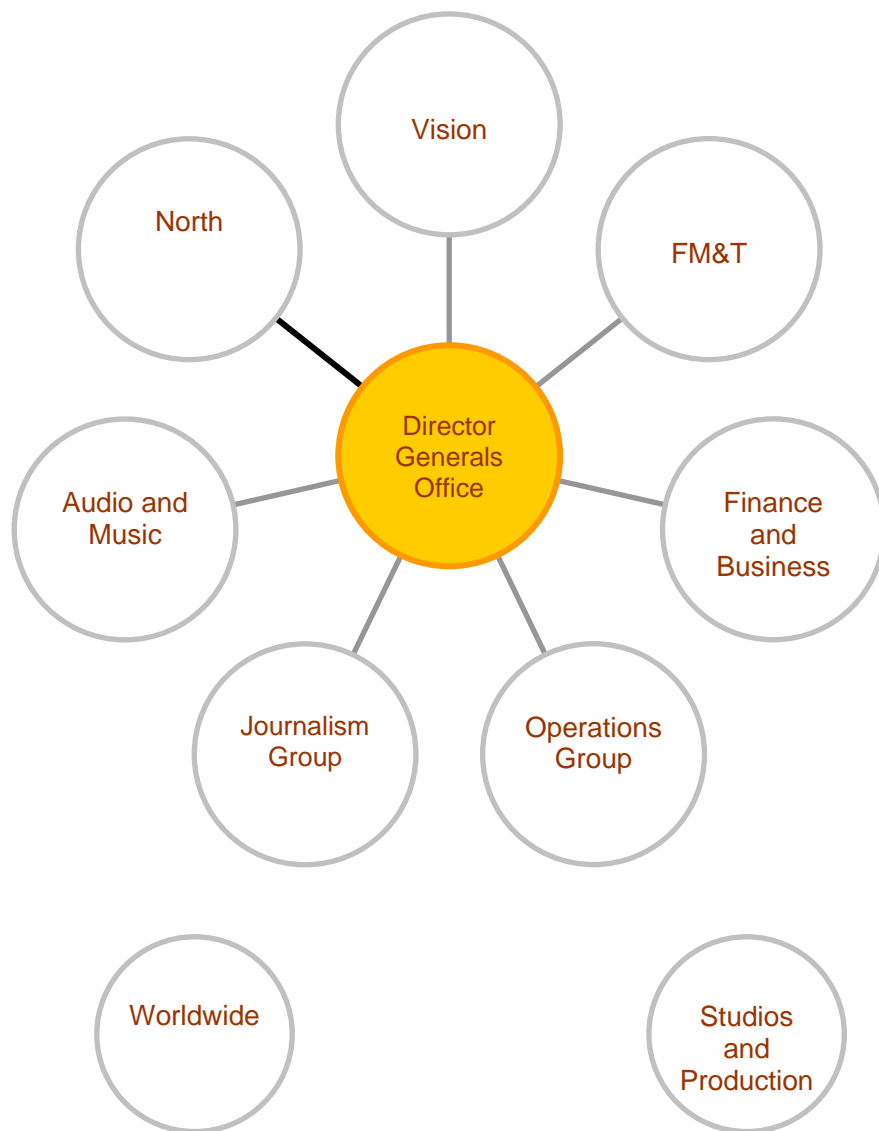
In circumstances where BBC employees are seconded, loaned or hired to other organisations, including Independents, the BBC will require the appropriate standard of care from that organisation.

The BBC places considerable reliance on its relationships with partners, associates and contractors. It aims to select organisations that are competent and which have the necessary arrangements to co-ordinate any work carried out on our behalf. The Corporation requires and expects business partners, associates, contractors and suppliers to set and achieve appropriate standards of Health and safety risk at Work.

### **2.2 Organisational Structure of the BBC**

In April 2007 a new and simplified structure for the BBC, one which had Marketing, Communications & Audiences firmly at the centre was introduced. There are three cross-media content groups called Journalism, BBC Vision and Audio & Music. Then there's the Future Media & Technology group whose key strategic role is to be the pathfinder for the BBC ensuring that the BBC exploits technological developments to extend the reach and accessibility of our content on any device, any time, anywhere. The Central Services divisions like BBC People, Operations and Finance have an important role in how the BBC operates and is managed, providing key specialist skills. BBC Worldwide and BBC Studios and Production Ltd, continue as the commercial arm of the BBC.

See diagram



## 2.3 Purpose

The purpose of a health and safety management system is to enable an organization to control its health and safety risks and improve its performance. It aims to eliminate or minimize risk to employees and other interested parties who may be exposed to risks associated with its activities. It enables the organisation to assure itself of its conformance with its stated H&S policy and to demonstrate such conformance to others. The system will also assist the organization in meeting applicable legal or other health and safety risk regulations.

This document has a number of functions which are to:

- set out and define the structure of the safety management system
- set the requirement for the establishment of Corporate Health and Safety Policies
- ensure responsibilities for the system are established and maintained.

## 2.4 The myRisks Framework

There are a number of elements to the framework which drive the development and implementation of a complete management system by the organisation. The relationships of these to the OHSAS 18001 specification are detailed in section 1.3.1. The information, processes and tools are maintained on, or can be accessed from, the myRisks intranet system on Gateway and should be referenced when local procedures are being developed and implemented.

The elements create an effective framework to maximise the contribution of individuals and groups whilst recognising that health and safety is a line management responsibility. The framework, through a systematic approach, supports the BBC's commitment to continuous improvement in its health and safety performance.

## 2.4.1 Relationship to OHSAS 18001 model

The Table below shows the relationship between the OHSAS 18001 specification and the sections within this document. In a few cases more than one aspect of the model are contained within a single section.

OHSAS 18001		Organisation & Arrangements	
Ref.	Title	Section	Title
4.1	General Requirements	1	Scope of the System
4.2	Health & Safety Policy	2	H&S Policy statement and system documentation
4.3.1	Health & Safety Hazard Identification & Risks	4	Assessment and Control of Health and Safety Risks
4.3.2	Legal and Other Requirements	5	Legal and Other Requirements
4.3.3	Objectives and Targets	6	Planning, Objectives and Targets
4.3.4	Health & Safety Management Programme(s)	6	Planning, Objectives and Targets
4.4.1	Structure and Responsibility	7,8	Management Organisation & Responsibilities
4.4.2	Training, Awareness and Competence	9	Training, Awareness and Competence
4.4.3	Communication	10	Communication and Consultation
4.4.4	Health & Safety Management System Documentation	3	Information, Documentation and Record Management
4.4.5	Document Control	15	Information, Documentation and Record Management
4.4.6	Operational Control	11	Assessment and Control of Health and Safety Risks & Supply Chain
4.4.7	Emergency Preparedness and Response	13	Emergency Preparedness and Response
4.5.1	Performance Measurement and Monitoring	14	Monitoring and Reporting
4.5.2	Non conformance and Corrective and Preventive Action	14	Monitoring and Reporting
4.5.3	Records	15	Information, Documentation and Record Management
4.5.4	Health & Safety Management System Audit	16	Audit
4.6	Management Review	17	Review of Performance

The myRisks management system is not a stand alone item nor is it composed purely of IT systems and software. It comprises all the components necessary to manage the health and safety risks arising out of, and associated with, the BBC's undertakings including for example skills and management training, corporate governance, HR, insurance, legal, FM provision and procurement. The system is based on the OHSAS 18001 specification which is largely a Plan-Do-Check-Act process and ownership and responsibilities are integral to the various business process owners.

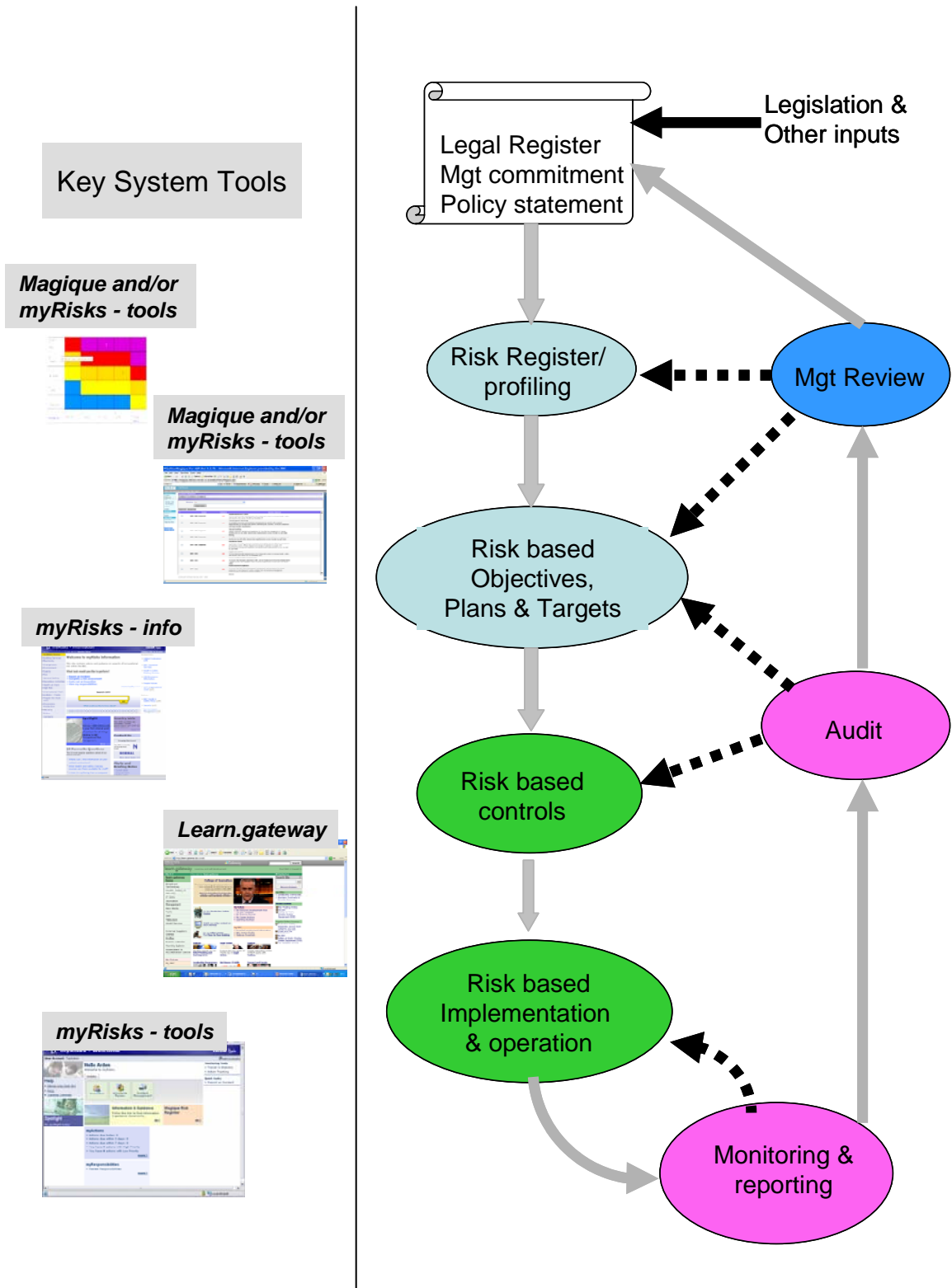
The philosophy behind the system is that the people responsible for creating the risk are the people responsible for managing the risk. It is for this reason that a significant amount of effort has been put into developing relevant IT tools to help managers fulfil their responsibilities and in so doing, as a minimum, meet legal requirements. The governance of the system is described in section 5.

This manual breaks the system down into a number of core components. These are:

- Policy statements and other related documentation (section 2)
- The management organisation (section 3)
- Key support functions (section 4)
- Relationships with Other Parties (section 5)
- Responsibilities (section 6)
- Other System Components (section 7 – section 17)

An overview diagram of the system is represented in Diagram 1

Diagram 1: Overview of myRisks System



# **3 HEALTH AND SAFETY POLICY STATEMENT AND SYSTEM DOCUMENTATION**

## **3.1 Corporate Health and Safety Policy**

The health and safety policy establishes an overall sense of direction and set the principles of action for the BBC. It demonstrates the formal commitment of top management towards good health and safety management.

The Head of BBC Safety is responsible for a biennial review of the policy statement, the revised statement is approved by the BBC Safety Committee (BSC) before being authorised by the Director General. The policy is published via the BBC intranet and internet sites. Employees are made aware of their individual health and safety obligations through the induction and training processes and information/guidance on the BBC Safety intranet site (myRisks)

The policy statement is supported by this document which describes our organisation and arrangements and by the the myRisk management system . These are maintained by the head of BBC Safety on behalf of the Executive director with specific responsibility for health and safety risk, the Chief Operating Officer .

The Policy Statement is shown overleaf:-

# BBC Health and Safety Policy Statement



Here to help get programmes made

The BBC exists to enrich people's lives with great programmes and services that inform, educate and entertain. Our vision is to be the most creative and trusted organisation in the world.

Health and safety is integral to this vision and our performance. Our overall objective is to provide and maintain a safe and healthy environment for our employees, the people we work with and for those who visit us.

We will achieve this by:

- continual and effective improvement of health and safety performance
- compliance, as a minimum, with all applicable legislation, BBC requirements and any other adopted requirements
- implementation and continued improvement of a health and safety management system based on the requirements of the British Standards Institute Specification, OHSAS 18001:2007
- having systems to identify and mitigate risk
- the setting and review of health and safety objectives and targets
- monitoring, audit and review of the policy, the management system and their implementation to ensure their suitability, adequacy and effectiveness
- consulting with staff and trades-union safety representatives on issues of health safety and welfare
- provision of suitable and sufficient health and safety information, instruction and training to enable all staff to carry out their jobs competently
- investigating and learning the lessons from incidents
- selection and monitoring of competent third parties to ensure appropriate standards of health and safety are achieved
- effective communication and co-operation with third parties so they are aware of our health and safety expectations

Health and safety is everyone's responsibility and a prime responsibility of all levels of management, and I expect everyone to contribute towards achieving our overall objective.

We will provide adequate and appropriate resources to implement this policy and will ensure it is properly communicated and understood.

The Executive and I aim to encourage initiative and adopt best practice in a culture where employees and managers are aware of their individual health and safety responsibilities and are actively engaged and committed to improving standards of health and safety.

A handwritten signature in black ink, appearing to read 'Mark'.

Mark Thompson  
Director General

Authorised September 2009 / Next review 2011

## 3.2 Guidance

myRisks information system is available through the BBC intranet and with some small exceptions on the intranet.

The information consists of the policy statement, Guidance and Requirements. Whether the information can be seen as “optional” or “mandatory” is made clear by the context.

The word “policy” can sometimes be used informally to describe those elements of our system which are mandatory. However, strictly we reserve the word “Policy” for the Health and Safety Policy Statement.

Documents which are used where the level of technical detail needed is high and which requires specialist competencies for its interpretation and application are referred to as technical standards. They will usually have a defined and smaller target audience. They are typically not available directly to staff but are held by BBC safety or other specialist areas for reference.

Guidance describes what is required and provides tools on how to achieve it. It provides the source of reference for the vast majority of end-users. The guidance identifies BBC and Industry best practice and provides general advice on how to meet the requirements and achieve safe systems of work. In general, the BBC will adopt guidance publications produced by the Health & Safety Executive (HSE). However, on occasion, it will be necessary to put the guidance into Divisional organisation and arrangements

The BBC intends as a matter of principle to simplify much of its existing guidance so that meets the needs of most users rather than trying to act as a textbook covering every aspect of every issue. This means that many people who are to an extent “expert” require to supplement the guidance on myRisks with information from other sources including their training and professional knowledge. Guidance on myRisks aims also to highlight areas where the BBC asks for some specific action which is not covered in legislation.

## 3.3 Other Health and Safety Performance Standards

Performance standards for health and safety risk are identified through the risk assessment process. Specific requirements and guidance necessary to achieve safe systems of work are set and documented within the corporate Guidelines and standards through the editorial process (see section 15.4 below). At a local level these are reflected in local procedures and work instructions. All published corporate health and safety documentation is subject to a formal review cycle managed by the Head of Safety Policy and Compliance. They are also reviewed specifically as a result of a change, whether an external change e.g. legislation, or an internal change e.g. as a result of an incident, outcome of an audit etc.

## 3.4 Local Procedures, work instructions, guidance

These are documents which describe the way in which the Business Unit, or part, will meet the corporate requirements where it is not set out specifically in the corporate documentation or where the Business Unit wishes to set a higher standard. Corporate documentation will be of sufficient detail to meet the needs of the business in the majority of cases.

Divisions may choose to produce their own statement of organisation and arrangements to implement Corporate Policy and which link to this corporate manual. This will set out how the Division supports the achievement of the Corporate and Divisional aims and objectives as well as Divisional health and safety risk objectives. The organisation and arrangements describe the responsibilities and mechanisms by which the Division will meet the relevant corporate requirements and how the corporate responsibilities cascade to the Division. It will also describe any Divisional documentation, associated responsibilities and how it relates to corporate documentation.

# 4 ASSESSMENT AND CONTROL OF HEALTH AND SAFETY RISKS

The hazard identification, risk assessment and risk control processes and their outputs form the basis of the safety management system. It is important that the links between the hazard identification, risk assessment and risk control processes and the other elements of the management system are clearly established and apparent.

## 4.1 Hierarchy of Risk

Within the BBC there are several levels to which the risk assessment process applies. Activity and programme level assessments are event-triggered and are covered by the risk assessment guidelines (ref myRisks). Strategic risk analysis is applied at Departmental and Divisional levels as well as at the Corporate level and is covered by the Magique system.

## 4.2 Types of Risk

Several types of risk fall under the remit of health and safety:

- Risks of injury
- Risk of ill-health
- Risk to business continuity eg bomb threat
- Risks of legal non-compliance
- Risks to reputation

There are fundamental differences between each risk type and hazardous activities may have several risk types applying to them.

Strategic risk assessment needs to be informed by relevant data and requires input from a variety of sources:

- Risk Assessments
- Incidents
- Inspection results
- Actions (current and over-run).
- Legal and other requirements.
- H&S Policy decisions.
- Non-conformances.
- Audit/Assurance findings.
- Typical hazards known to be experienced in the organisation.

In the BBC, the current repository for strategic business risks, at a Divisional level, is Magique. Any strategic analysis of business risks needs to include health and safety and H&S risks should be represented in Magique in a way which allows direct comparison with equivalent strategic risks.

## 4.3 Risk Assessment

Risk assessment is the responsibility of the line manager in control of that particular operation. The scope of the assessment is important to define – some assessments will provide a description of control for a small part of the organisation or for a relatively limited time frame. Others will apply to the whole organisation and may be applicable continuously.

The myRisks system provides tools and guidance for recording risk assessments. The BBC typically refers to specific and generic risk assessments.

Generic Assessment – an assessment which covers routine and familiar tasks and for which controls do not change each time the task is performed. The generic assessment should still identify when it is valid for and who is responsible for the controls.

BBC myRisks system also records a number of “model” risk assessments. These record hazards and controls for a number of common activities however in order for them to be valid risk assessments they have to be reviewed to ensure the controls are suitable and sufficient,, the person responsible must be described and the circumstances in which the assessment is being used must be described. Additional controls can be added and suggested controls removed – but only if the reason for removal is described.

“Safety Guides” – safety guides are developed for some parts of the organisation. A Safety guide describes the recommended safety arrangements for that activity in that part of the organisation. They are most effective when linked to a set of generic or model risk assessments. When an activity is covered by a safety guide and its linked generic risk assessments then it is not necessary to do a specific risk assessment for that activity – providing that the person undertaking it understands the controls that are described for it.

Every assessment must be “signed off” (approved) by a competent person. This can be the person carrying out the risk assessment, a different (more senior) person or could be a group of people.

The BBC does not expect that a separate risk assessment be carried out for every activity. Risk assessments should focus on aspects of a person’s work which are novel or unfamiliar, where control measures require more than applying a person’s day to day knowledge, skills and experience.

## **4.4 Risk Review**

The Head of BBC Safety is responsible for the analysis of Corporate H&S risks, and the development of Corporate objectives. Actions are cascaded to the Divisions and BBC Safety work with the Divisions to enable them to perform their own analysis and to form their own H&S objectives and actions.

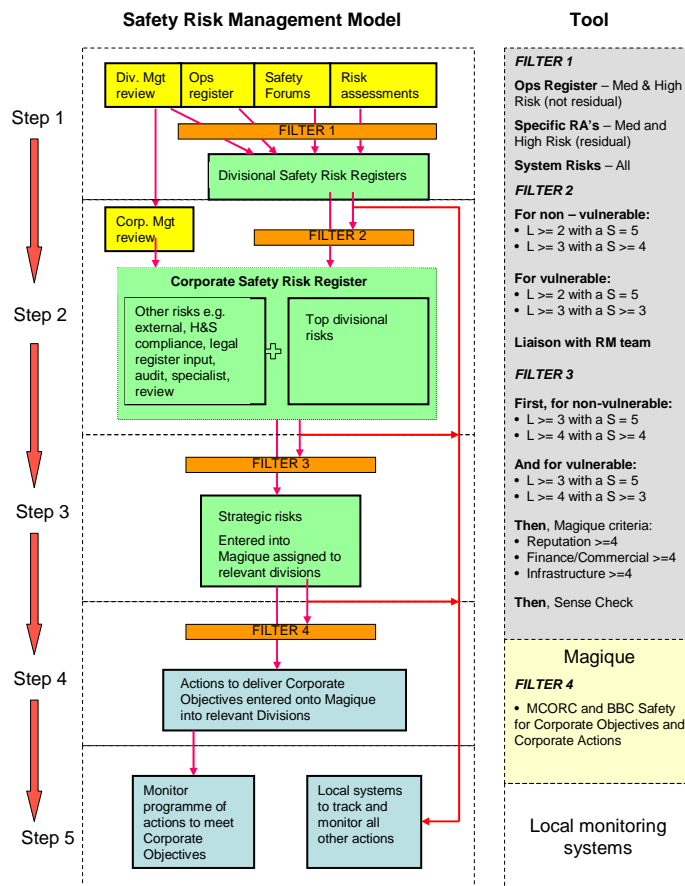
## **4.5 Risk Registers**

Individual Divisions identify their own risks through a process of risk assessment and risk review. Divisions hold this in different ways. Feedback through the safety forums and divisional safety leads provides information to BBC Safety who keep a register of the most significant using the Corporate Risk database (“Magique”).

A risk register for the significant health and safety risks is maintained corporately by the Head of BBC Safety on behalf of the Executive. BBC Safety also assist Divisions in maintaining a Divisional Safety Risk Register.

Magique's strategic role is to act as a knowledge base to inform quarterly risk reporting to the BBC Direction Group, Executive Board, Executive Audit Committee and the Trust. It provides a single platform for risk identification, scoring and management across all Divisions in the BBC. Divisions are expected to use Magique to identify the principal risks to their key divisional operations, their objectives, their major change projects, their strategic goals and any other relevant expression of the Divisions purpose [business plans, operating models etc.].

From the identified risks, key objectives of the corporation and the divisions are set and action plans derived.



(see also diagram in section 6.5 below Planning)

## 5 LEGAL AND OTHER REQUIREMENTS

### 5.1 Regulatory Requirements

BBC Safety monitors relevant health and safety legal requirements applicable to BBC's activities in the UK. Key changes are identified to the business through the Quarterly performance report which is received by BSC.

BBC Safety also engages with legislators regarding consultation on new legislation.

Requirements of forthcoming legislation are communicated to the divisions to enable them to prepare changes to their procedures.

### 5.2 BBC Requirements

The organisation needs to be aware of and understand how its activities are, or will be, affected by other requirements to which it subscribes. These may be industry best practice guidance etc and where these are to be applied by the BBC then they will be referenced in relevant BBC documents, either corporately or locally.

The BBC aims first to achieve legislative compliance. Higher or different standards may from time to time be appropriate but these should be proportionate to risk. The BBC relies on external standards for the majority of its activities. Any difference is described in guidance either for the corporation as a whole or for some constituent part.

## **6 PLANNING, OBJECTIVES AND TARGETS**

The requirements of this section cover the inputs, processes and deliverables of effective planning to enable the achievement of health and safety objectives and to provide the basis for ensuring that ongoing improvements are secured. They describe the means by which planning for health and safety should be undertaken as an integral part of the Company's Business Planning Process.

### **6.1 Setting of Objectives and Targets**

### **6.2 Overall Objective**

The BBC sets out to measure and report on its health and safety performance with the aim of establishing the level of achievement of measurable objectives and targets.

### **6.3 Corporate Target and Objective Setting**

The BBC Executive sets strategic targets which are designed to drive continuous improvement in safety performance. Safety targets are focussed on HSE "revitalising health and safety" priority areas and significant areas of risk identified from the risk register. The risk register contains a list of the most significant health and safety risk issues within the corporation as a whole and is used to determine whether any recommendations are needed for changes to strategic targets, objectives and actions, to ensure that they remain relevant to the risk profile. The register is reviewed annually by BBC Safety and recommendations made to BSC.

The drafting and review of strategic targets together with specific objectives and actions to achieve those objectives is the responsibility of the Head of BBC Safety and approved by BSC on behalf of the corporation as a whole. They are cascaded to business unit and third parties as appropriate. Strategic targets are set with a 5-10 year lifespan.

### **6.4 Divisional Targets and Objectives**

Divisions may also set targets and objectives applicable only within that division and which are designed to focus attention on specific areas of risk within that Division. The process for agreeing these and recording them may vary from division to division and where required they will be stated in the Divisional arrangements.

### **6.5 Corporate and Divisional Action Plans**

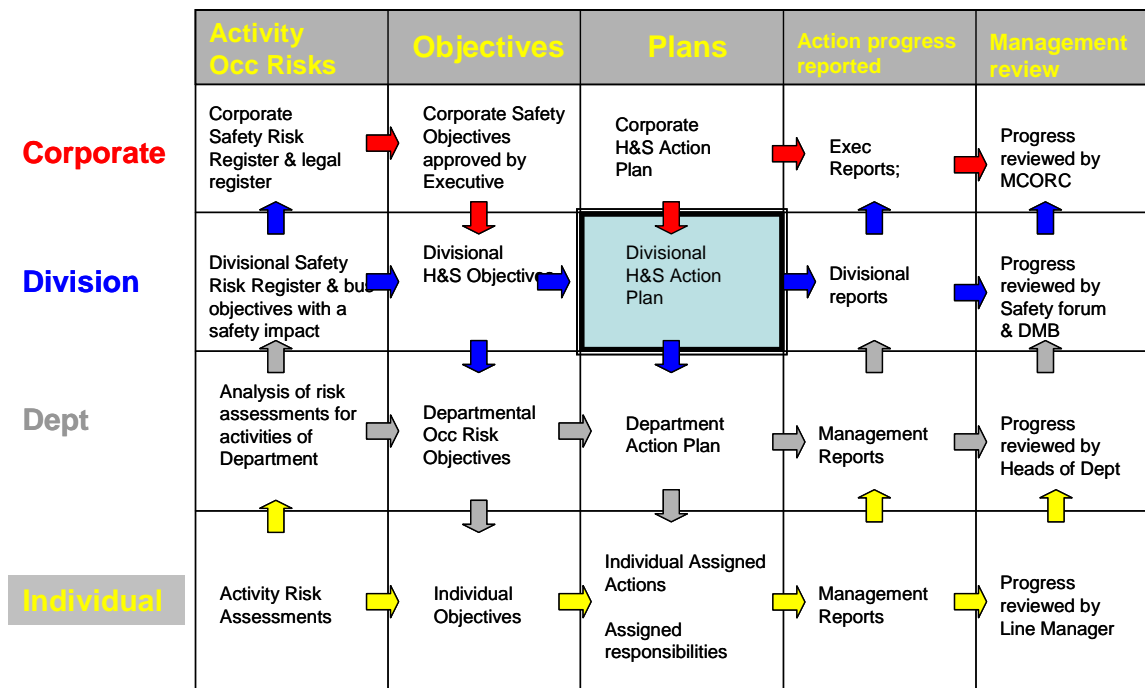
Health and safety is integral to the planning of all our business and work activities to ensure adequate resources are provided to implement health and safety requirements. Corporate Health and Safety objectives and key actions are developed annually by BBC Safety for review by BSC. In normal circumstances their preparation should follow the BBC's annual business planning cycle. Approval of the objectives and key actions is the responsibility of BDG.

Once the corporate objectives have been approved, the Divisional H&S Action Plans are agreed by the Divisional Management Board (DMB) taking into account the corporate objectives, the division's key risks and the legal register. This is the responsibility of each Divisional Director. The Divisional Plan should therefore take into account the corporate objectives and key actions, health and safety issues specific to the Division and any business objectives identified in Magique which may have a health and safety risk impact if not managed adequately. Policy changes, audit reports, lessons learnt from accidents, other health and safety performance indicators and future targets should also be considered.

Progress against the divisional plans will be reviewed at least quarterly by the DMB or delegated body as identified in the Divisional arrangements. Updates on progress and divisional performance

are also presented and discussed at BSC. The progress against corporate objectives and key activities will be prepared by BBC Safety (See Section 14.4 below) and this will be reviewed by BSC.

The diagram below indicates the relationships between the risks, objectives and plans across the organisation and demonstrates the cascade principle for objectives and action plans.



# 7 MANAGEMENT ORGANISATION

## 7.1 Management Levels for Health and Safety

Routine management of H&S is the responsibility of all line managers. To ensure coordination and management engagement there are 3 levels of corporate management. The chart illustrates the structure which is:

**Executive Level** – Executive Board, and BDG setting H&S policy and scrutinising through formal reports at least quarterly and at other times when specific issues demand.

**Group and Divisional Level** – Group and divisional level boards approving management plans, reviewing progress and monitoring performance at least quarterly and more frequently as necessary.

**Divisional Safety Forums** – divisional, regional or local forums specifically convened for, and dealing only with H&S. Representation from each department or functional area, meeting at least quarterly to develop and implement H&S action plans, review progress and monitor key H&S requirements.

**Divisional Senior Manager.** Each board should nominate a Divisional Senior Manager to take lead responsibility and champion H&S in their area. Divisional forums should be led by a senior operational manager with cross division authority for H&S.

**Cross-corporate Forum.** The BBC Safety Committee (BSC) which is made up of lead individuals in each division area (usually the chair of the divisional safety forums) will provide a pan-corporate forum for communication and coordination of policy, guidance and initiatives. The BSC has direct executive authority devolved from the Executive Board.

## 7.2 Summary of Key Responsibilities

### 7.2.1 BBC Trust

- Assures itself through annual reports and ad hoc interventions that H&S is being properly managed

### 7.2.2 Executive Board/BDG

- Set Corporate H&S Policy
- Set Corporate H&S Targets and Objectives
- Establish effective Organisation and Arrangements for H&S management
- Communicate, promote and champion H&S issues.
- Monitor performance through quarterly reports which include:
  - Accident and incident statistics and trends
  - Work-related ill-health statistics and trends
  - Review of significant accidents and incidents
  - Review of key risks and H&S issues
  - Performance of H&S training and communication
- Quarterly review by Audit Committee of outstanding H&S Audit actions

### 7.2.3 Group and Divisional Boards

- Set Group and Divisional H&S Targets and Objectives aligned to corporate objectives
- Establish group and divisional Organisation & Arrangements including establishing appropriate H&S Forums
- Nominate responsible individuals for significant productions or events.

- Establish communication and consultation arrangements with staff, including where appropriate, local union safety committees.
- Monitor H&S performance through quarterly reports which include:
  - Accident and incident statistics and trends
  - Work related ill-health statistics and trends
  - Progress against Group and Divisional action plans
  - Review of significant accidents and incidents
  - Analysis of active monitoring including risk assessment, investigations and training.
  - Key risks and issues

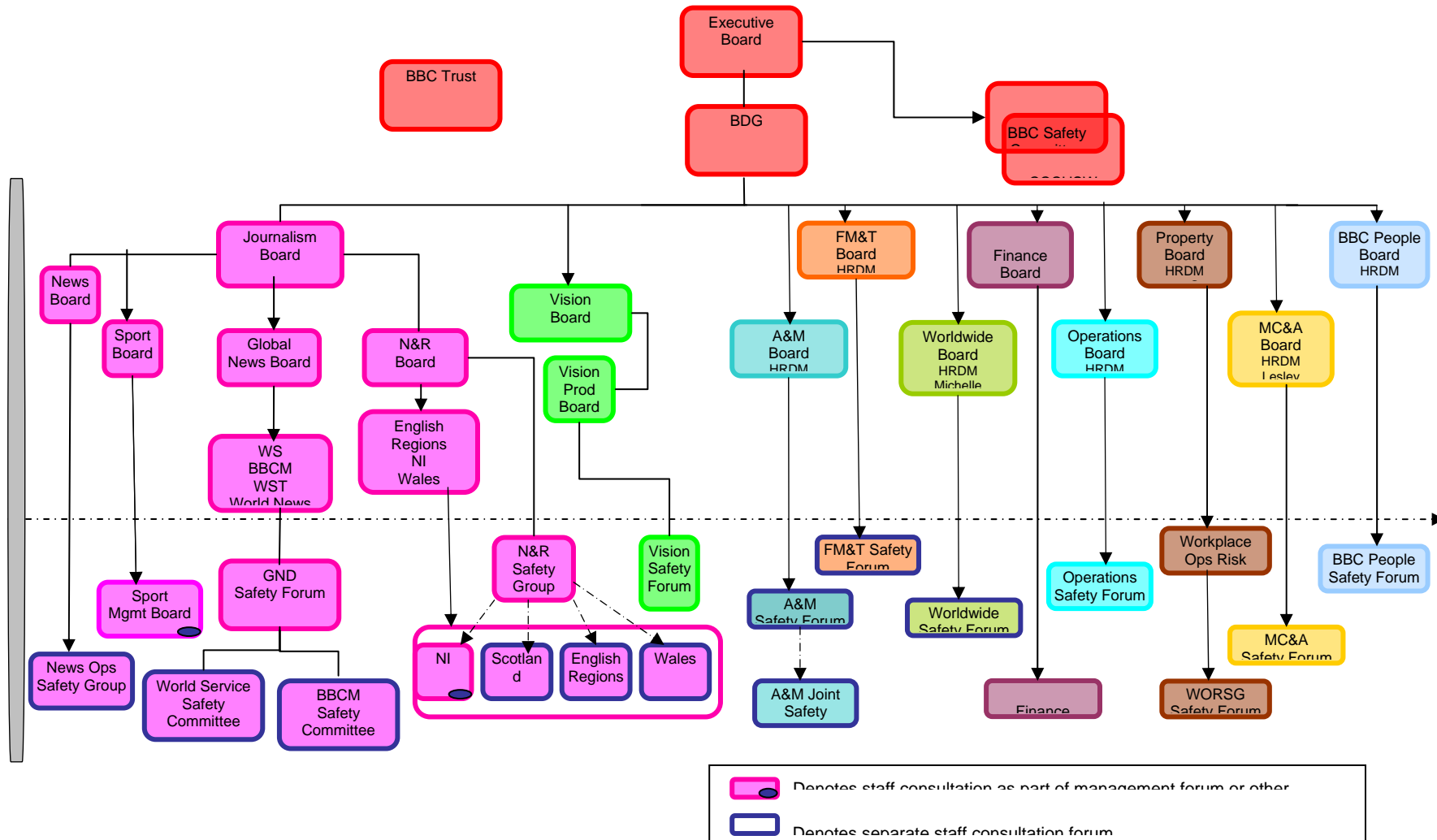
### **7.3 Divisional Safety Forums**

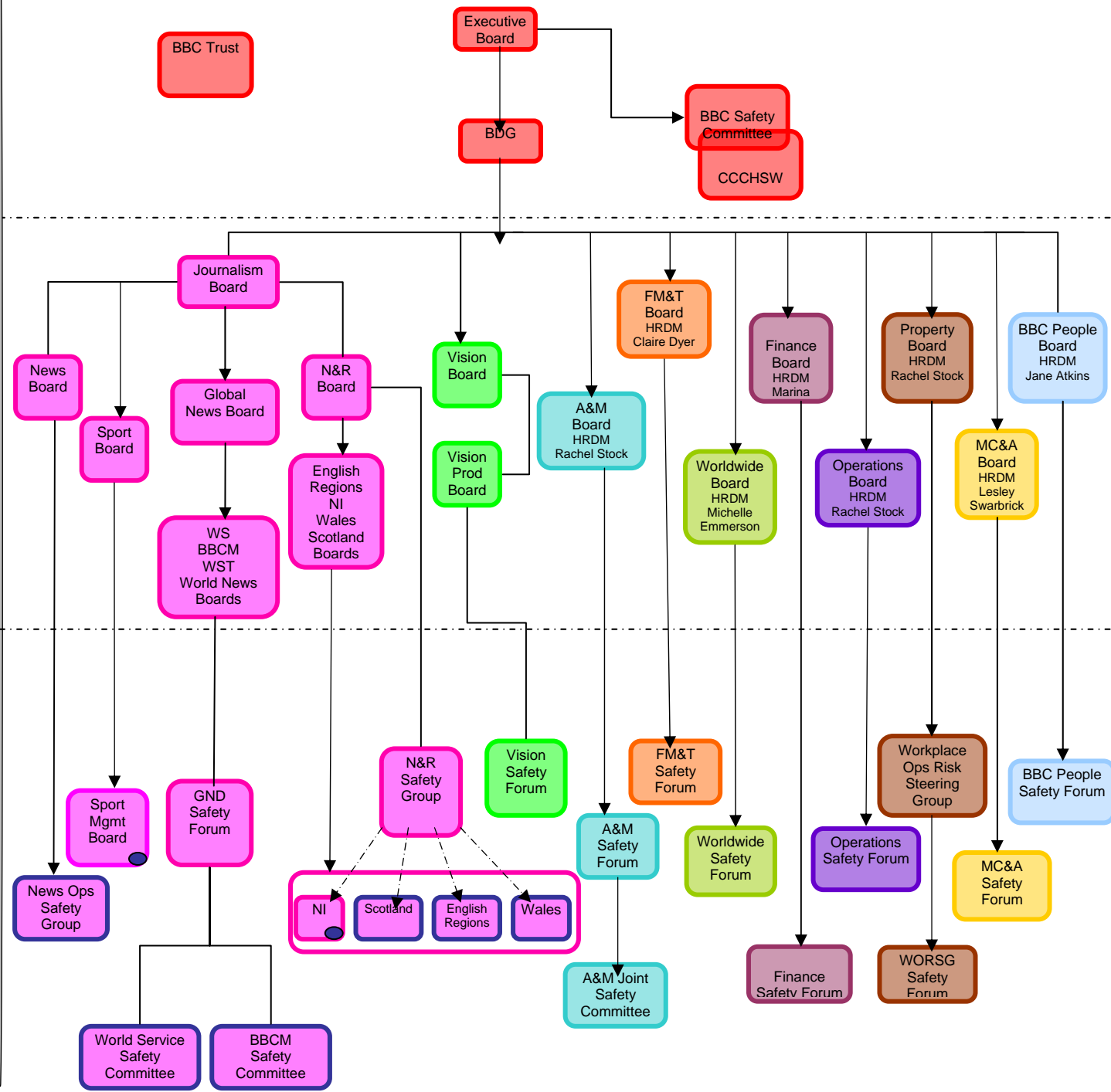
- Develop H&S Action Plans to meet divisional objectives
- Maintain a divisional H&S risk register listing all significant activities and a single point of responsibility for each.
- Monitor the production and regular review of risk assessments
- Develop a programme of active monitoring (visits, checks and inspections) and record significant findings and improvement actions.
- Establish divisional lead(s) for accident and incident investigation. Review and communicate findings from significant investigations
- Review H&S performance through Quarterly Divisional H&S Forum Report to include:
  - progress against H&S action plans
  - Accidents and incidents trends, investigations and lessons learned
  - analysis from active monitoring including schedules, responsibilities, training and risk assessments
- Issues to be escalated to other forums (recommendations)
- contractors and partners performance
- Monitor H&S training needs and completion of courses

### **7.4 Subsidiary Organisations**

Worldwide Ltd and Studios and Post Production Ltd are subsidiary companies and are separate employers insofar as UK H&S legislation applies. They have their own safety policies . In addition Worldwide Ltd has chosen to adopt the BBCs systems, and standards for managing safety and health. Studios and Post production has not. Other companies completely or partially owned by the BBC have their own policies and arrangements but may be monitored by the BBC, For the purposes of these Organisation and Arrangements Worldwide may be considered to be a "division".

## 7.5 Committees and Forums With Responsibility for Safety

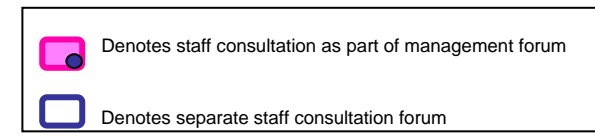




- Executive Board/BDG
  - Set Corporate H&S Policy
  - Set Corporate H&S Targets and Objectives
  - Establish effective Organisation and Arrangements for H&S management
  - Communicate, promote and champion H&S issues.
- Monitor performance through quarterly reports which include:
  - Accident and incident statistics and trends
  - Work-related ill-health statistics and trends
  - Review of significant accidents and incidents
  - Review of key risks and H&S issues
  - Performance of H&S training and communication
- Quarterly review by Audit Committee of outstanding H&S Audit actions

- ### Group and Divisional Boards
- Set Group and Divisional **H&S Targets and Objectives** aligned to corporate objectives
- Establish group and divisional **Organisation & Arrangements** including establishing appropriate H&S Forums
  - Nominate **responsible** individuals for significant productions or events.
  - Establish **communication and consultation** arrangements with staff, including where appropriate, local union safety committees.
  - Monitor H&S performance through **quarterly reports** which include:
    - Accident and incident statistics and trends
    - Work related ill-health statistics and trends
    - Progress against Group and Divisional action plans
    - Review of significant accidents and incidents
    - Analysis of active monitoring including risk assessment, investigations and training.
    - Key risks and issues

- ### Divisional Safety Forums
- Develop **H&S Action Plans** to meet divisional objectives
  - Maintain a divisional **H&S risk register** listing all significant activities and a **single point of responsibility for each**.
  - Monitor the production and regular review of risk assessments
  - Develop a programme of **active monitoring** (visits, checks and inspections) and record significant findings and improvement actions.
  - Establish **divisional lead(s) for accident and incident investigation**.
  - Review and communicate findings from significant investigations
  - Review H&S performance through **Quarterly Divisional H&S Forum Report** to include:
    - progress against H&S action plans
    - Accidents and incidents trends, investigations and lessons learned
    - analysis from active monitoring including schedules, responsibilities, training and risk assessments
    - Issues to be escalated to other forums (recommendations)
    - contractors and partners performance
  - Monitor **H&S training** needs and completion of courses



## 8 Specific Organisational Responsibilities Related to the Management of Health and Safety

### 8.1 Executive Board

The Executive Board have a number of core responsibilities. Some of the core responsibilities relate, in part, to the management of health and safety risk. These are:

ensuring compliance with all the BBC's legal and regulatory requirements (including initial handling of complaints about the BBC), except where these areas specifically relate to the Trust or the Trust Unit

ensuring that the BBC's commercial arm carries out business in a way that is compatible with the Charter, Agreement, general law and the highest standards of financial management and control, including risk management

making arrangements for the training and retraining of BBC staff working to provide UK public services or making programmes for them.

### 8.2 BBC Direction Group

The BBC Direction Group (BDG) has been established under the delegated authority of the BBC Executive Board ("the Board") with the purpose of delivering effective governance of pan-BBC issues in line with responsibilities delegated to it from the Board and to provide senior level leadership on pan-BBC objectives. The BDG shall meet three times a month – the last meeting of each month will be dedicated to Digital Futures and Change programme work.

The Chair of the Group Board shall be the Director General or, in his absence, the deputy Director General and shall preside at all meetings of the Group Board. The other members of BDG will be the BBC's Group Directors, the Creative Director, and the Director of Vision Operations and Rights. Any other members of BBC staff may be invited to attend, as appropriate.

The core responsibilities of the BDG are:

- To ensure effective financial management of BBC activities as a whole, delivering value for money.
- To ensure effective operational management of the BBC including broadcast and business continuity, emergency planning, property and security
- To manage compliance with the BBC's legal and regulatory responsibilities and all requirements placed on the BDG by the Board.
- To ensure effective risk management of the BBC's activities.
- To lead and manage pan-BBC issues such as: understanding audiences, people issues such as HR policy and industrial relations and PR and communications issues.
- To manage BBC projects, including those falling under Digital Futures work and Change programme work.
- To ensure delivery of pan-BBC objectives and responsibilities.
- To approve papers going to the Board.
- To ensure good governance of the BBC.

The Learning Board (dealing with the BBC's learning strategy) and Complaints Management Board (dealing with the pan-BBC management of editorial complaints) will operate as sub committees of the BDG.

## 8.3 BBC Safety Committee (BSC)

BSC has been established under the delegated authority of the BBC Executive Board (“the Board”) with the purpose of developing and managing the BBC’s Occupational Risk policies and strategy. BSC is the focal point for health, safety, security, environmental management compliance, fire safety and food hygiene issues raised through each of the Divisions’ Management Board Meetings and Safety Forums. It aims to support managers and ensure that there is a co-ordinated approach across Divisions. BSC is chaired by the Head of BBC Safety and its membership comprises of Senior Managers responsible for health and safety management within the Divisions. BSC shall meet quarterly as well as dealing with papers off-line.

The role of BSC is to:

- approve strategy for compliance with health and safety and environmental legislative and other requirements
- approve policies and guidelines
- set objectives, standards and targets to improve health and safety and environmental risk management
- approve and monitor progress of the strategic improvement action plans
- investigate significant failures and monitor remedial actions
- review independent audit reports and endorse actions.

## 8.4 Audit Committee

The BBC Charter places a specific role upon the BBC Trust, for monitoring and supervision of BBC compliance with its legal obligations. This is normally exercised by the Board of Governors (BBC Trust) through the BBC Audit Committee

The core purpose of this committee is to ensure that the BBC meets the highest standards of corporate governance, particularly with respect to internal control and risk management. The committee is made up of three non-executive directors (one of whom is Chair). The Director-General, Group Finance Director, Head of Business Assurance and external audit representatives also attend. The committee meets four times a year

## 8.5 Senior Management Nominated Responsibilities

### 8.5.1 Chief Operating Officer

The Chief Operating Officer is the executive director with overall responsibility for health and safety. The Director is responsible for ensuring that the health and safety management system is properly implemented and performing to requirements in all locations and spheres of operation identified within the system scope. The Director is also responsible for the effectiveness of the BBC’s health and safety organisation and arrangements and ensures the provision of appropriate resources to enable persons with specific responsibilities for health and safety, including relevant committees, to perform their functions properly.

This role changed from Director BBC People October 2009.

She is responsible for:

- keeping the Executive informed of, and alert to, significant health and safety issues and initiatives that affect the Corporation
- ensuring that the Corporation has access to appropriate sources of competent advice and resource
- sponsoring the annual review of health and safety performance
- Authorising risk assessments that are general for the entire BBC.
- appointing the Head of BBC Safety

- chairing or appointing the chair of the Corporate Consultative Committee for Health, Safety & Welfare, the strategic consultative body with the Unions.

## 8.5.2 Divisional Directors

The Divisional Directors and Chief Executives are responsible for ensuring that suitable and adequate organisation and arrangements are in place for the management and control of health and safety within the Division.

The Divisional Senior Management assure themselves and the Executive that all the relevant processes are in place and working effectively to manage risks associated with their business activities through:

- risk assessment and prioritised objectives and actions
- self assessment and external assessment
- regular review of performance against defined targets

The Divisional Director will nominate a Divisional Senior Manager with responsibility for ensuring the effectiveness of the health and safety organisation and arrangements within their Division. The Divisional Senior Manager will keep the Divisional Director(s) informed of, and alert to, significant health and safety issues and initiatives that affect the Division and will sponsor the review of the Division's health and safety performance. The Nominated Senior Manager represents the Division at BSC unless representing a number of Divisions by prior agreement.

Each Division must produce its own organisation and arrangements based on the framework of the Corporate Health and Safety Organisation and Arrangements. The statements should set out how the Division will support the achievement of the corporate aims and objectives as well as Divisional health and safety objectives.

## 8.5.3 BBC Compliance Officer

The BDG has appointed a BBC Compliance Officer with specific responsibility, on behalf of the executive, for developing an appropriate framework for monitoring and reporting the BBC's compliance with relevant legal and regulatory requirements (other than editorial and financial reporting compliance) to ensure a degree of consistency and rigour that would withstand scrutiny and minimise the risk of non-compliance. The framework will cover the entire BBC Group including all BBC public service divisions, World Service, and all BBC subsidiaries.

## 8.5.4 Head of BBC Safety

The Head of BBC Safety is a senior manager, appointed by the Director of BBC People, and has overall responsibility for ensuring the maintenance and improvement of the system, including:

- the development, implementation, periodic review and evaluation of the health and safety management system to ensure it is fit for purpose and promotes continuous improvement;
- periodic reporting to the senior management on the performance of the health and safety
- ensuring that adequate arrangements are in place to provide:
  - focussed operational support to the BBC's key risk activities
  - competent advice and guidance with regard to health and safety
  - advice on relevant legislation and associated published guidance;
  - development of appropriate agreed policy and guidance that will apply across the whole BBC;

- assistance in the co-ordination of health and safety initiatives across the BBC to ensure maximum benefit.
- effective systems for monitoring, reporting and review

### **8.5.5 Chief Medical Officer**

The Chief Medical Officer is responsible for ensuring that a pro-active preventative approach to health risks is adopted across the BBC by analysing information and metrics identified and received from the BBC's outsourced providers. The Chief Medical Officer will ensure that adequate arrangements are in place to provide:

- Adequate specialist advice on health and safety health related matters
- Development of policies and procedures to promote the health and well being of BBC staff
- Health surveillance facilities
- Management of research and investigation into Health and safety health matters

The Chief Medical Officer will report on the performance of Divisions in managing the incidence of suspected work related health problems, and the response of staff to offers of health surveillance. This report will be provided to the BSC.

The BBC Chief Medical Officer is responsible for BBC Health strategy and corporate standards and for monitoring the clinical standards and clinical provision of the outsourced health provider's services.

## 8.6 KEY SUPPORT SERVICES

### 8.6.1 BBC Safety

Safety management is an essential activity in the business of the BBC and includes the management of risks related to health, safety, fire, building engineering services, security, high risk environments and activities, and food safety.

The management of health and safety is primarily a line management function. The roles of the BBC Safety department are to:-

- act as a key contributor to policy and strategy,
- provide supporting systems and tools,
- provide advice to the business,
- directly manage specialist risks,
- provide assurance services,
- coach the business in managing health and safety
- liaise with enforcing authorities on behalf of the BBC
- act as lead investigator for serious or high potential incidents.

BBC Safety is a department within the Service Delivery structure of BBC People.

### 8.6.2 Health Management Support

The responsibility for the health and welfare of BBC employees and others rests with the line manager. They, in conjunction with BBC People, are responsible for referring individuals or seeking advice from the outsourced service provider when appropriate or necessary.

The BBC Chief Medical Officer is responsible for BBC's Health policies and monitoring the clinical standards and clinical provision of the outsourced health provider's services.

The outsourced health service advises managers in their duty for the health and welfare of their employees by providing a service designed for diagnosing, resolving, and preventing work related ill health and promoting physical mental and social wellbeing, placing an emphasis on risk management. It also provides the BBC with statistics on work related, or suspected work related ill health.

Information and guidance on health matters and the relevant contact details are published on the BBC Gateway intranet site

[http://explore.gateway.bbc.co.uk/myrisks/myrisks\\_home/health\\_at\\_work.aspx](http://explore.gateway.bbc.co.uk/myrisks/myrisks_home/health_at_work.aspx)

The outsourced health service is provided by Capita and includes:

#### 8.6.2.1 Health Advice and assessments

##### Travel Health advice and prophylaxis.

Giving advice to individuals on the controls necessary to operate abroad, including advice on disease prevention, vaccinations, and prophylaxis such as malaria medication.

##### Pre-employment screening

Providing a screening service for those who are to be employed in work that requires a specific medical standard due to health and safety reasons such as work at heights, driving, travel abroad, work in confined spaces, steadicam etc.

##### Fitness for work assessments

Providing advice on continued suitability/fitness for work where a specific medical standard is required from a health and safety perspective.

##### Health surveillance

Where indicated and where appropriate providing health surveillance services to monitor the health of those exposed to noise, respiratory sensitisers and skin sensitisers or irritants.

### 8.6.2.2 Workplace design and ergonomics

#### Workstation assessments

Providing an assessment of the workstation where a user has experienced difficulties or symptoms.

#### Furniture/equipment supply

Advice on the ergonomics of new furniture or equipment prior to procurement

#### Ergonomic advice on equipment, processes and the working environment

Advice on the interaction between equipment used, the work tasks and processes and the working environment

### 8.6.2.3 Programme/production specific advice

Advice, either in the UK or abroad, on the control of health risks associated with

- specific locations abroad
- specific risks such as animals, filming in hospitals etc
- specific location risks eg water, dusts, radiation, violence, hot or cold environments, altitude

Advice, where necessary on the fitness of individuals to undertake work with specific health risks

### 8.6.2.4 Case management

#### Long term and short term sickness

Advice on the management of long term and short term sickness absence with advice on whether there are work factors involved, what adjustments are necessary to work and advice on rehabilitation/resettlement back into work, including the provision of physiotherapy for work related conditions.

#### Advice on work related or suspected work related conditions

Advice on the management of work related or suspected work-related conditions and controls necessary at work to prevent further occurrences in this and other individuals.

#### Pensions and retirements

Advice on late entry to the pension fund, retirement on the grounds of ill health and early payment of preserved pension.

### 8.6.2.5 Out of Hours service

There is an advice line available from 5pm to 9am which provides generic travel advice and generic health advice.

### 8.6.2.6 The EAP service provided by BUPA

A telephone and face to face Counselling service dealing with both work-related and home related problems. This is available 24/7 and also to staff members abroad.

### 8.6.2.7 Overseas medical emergency service provided by CEGA

A helpline is available to travellers who are overseas to be used in the event of medical illness or injury whilst abroad. This includes medical advice, arrangement of minor medical treatment abroad if necessary, and casualty evacuation and repatriation facilities. This is provided through BBC insurance.

### 8.6.3 Business Continuity And Disaster Recovery

Whatever the incident – whenever it happens - the BBC is expected to be there for its audiences. It's the responsibility of every BBC department to make sure that happens by preparing and rehearsing robust and flexible plans for when business as usual is not possible. Key personnel within each division have responsibility for business continuity and disaster recovery, ensuring plans are prepared and rehearsed. Across the BBC, these people make up the Business Continuity & Disaster Recovery Team, the BCDRT, which meets every 6 weeks.

The Business Continuity Unit is responsible for co-ordinating the BBC's response to any major incident, working with the BCDRT as the hub of the BBC's emergency response.

#### The role of BCDRT is to

- discuss current issues and identify future threats
- provides a source of expertise for responding to emergencies
- ensure all areas of the business has arrangements and plans for business continuity and emergencies and they are rehearsed

### 8.6.4 Business Assurance (“Internal Audit”)

Business Assurance is independent of BBC Divisions. The Head of Business Assurance reports directly and separately to the Chair of the Audit Committee and to the BBC's Director-General. This reporting structure within the organisation permits authority to promote independence and to ensure broad audit coverage, adequate consideration of audit reports, and appropriate action on addressing audit recommendations.

The scope of Business Assurance includes the examination and evaluation of the adequacy and effectiveness of the BBC's systems of internal control and the quality of performance in carrying out assigned responsibilities. The function aims to help the BBC accomplish its objectives by bringing a systematic, disciplined approach to evaluating and improving the effectiveness of internal controls, risk management and governance processes.

### 8.6.5 BBC Workplace

BBC Workplace are responsible for the management of BBC occupied premises in England and Scotland (separate arrangements presently operate in Wales and Northern Ireland where responsibility is discharged through the Journalism Division – in liaison with BBC Workplace Operations). This responsibility is discharged through third party contractors and is detailed in the relevant divisional organisation and arrangements documents.

Performance monitoring of the contract is carried out by BBC Workplace Operations Performance Managers.

Contract and management arrangements for the service and operation are described iare available from BBC Workplace Operations.

#### 8.6.5.1 BBC Premises

Property owned or leased/rented by the BBC for normal day-to-day activities (i.e. commercial, studio or production facilities) mainly falls within the responsibility of BBC Workplace which is part of BBC Operations Group. The BBC Head of Corporate Real Estate holds ultimate responsibility for the direction of its real estate management which is discharged through his senior management team for ongoing property management operations these include responsibilities for health and safety risk management. These responsibilities extend to managing the performance of third parties contracted to undertake property management and transaction services on behalf of the BBC for both facilities and building activities.

Management for the acquisition and disposal of the BBC property portfolio both owned and lease/rented used by BBC staff for normal mainly fall within the control of Head of BBC Workplace and all transactions are managed by our external property agents (currently Lambert Smith Hampton). BBC Workplace is responsible for ensuring the safe transfer of information relating to property which it acquires relating to health and safety.

If the BBC plan to occupy any premises for more than 6 months BBC Workplace must be involved.

Exceptions to the above for leasing/renting property on a temporary basis is managed through production department arrangements e.g. location production.

### **8.6.6 General Support Services**

Reference to general support services and functions e.g. finance, operations (legal etc), HR can be found on the Gateway site.

## 8.7 Relationship With Third Parties

### 8.7.1 General

The BBC may retain some responsibility for the safe performance of activities undertaken by third parties. Even when there is no specific legal responsibility arising from the activity the BBC's reputation may still be affected by the third party action.

The BBC ensures, that third parties, which they appoint for the supply of goods and/or services, have adequate arrangements in place for the management of health, safety, and fire risks. This is achieved through assessment prior to appointment (Vetting) and monitoring during the life of any contract.

The BBC will give Third Parties any information the BBC holds which will help complete the work safely; on our behalf. Any specific standards the third party is required to meet will be set within their contract.

The BBC representative in charge of an activity for which any third party is engaged will ensure:

- that third parties have been selected in accordance with BBC Procurement Standards and are competent for the activity they are to carry out.
- The work of third parties are properly coordinated with BBC and other third parties.
- arrangements are in place for the exchange of information on risks, responsibilities and controls;
- there are suitable arrangements for supervision, reporting and monitoring.

For high-risk production activities there are predefined vetting requirements which must be met before such contractors can be added to the approved list:

[http://explore.gateway.bbc.co.uk/buybookorder/bbo/production/location\\_event\\_services/live\\_events.aspx](http://explore.gateway.bbc.co.uk/buybookorder/bbo/production/location_event_services/live_events.aspx)

Only in certain circumstances can contractors be used for such activities from outside this list; for example where nominated by a premises owner. There are arrangements for the nomination by productions of contractors to be added to the list but they will be vetted to the same standards as those currently on the list prior to their appointment.

High risk production contractors are vetted and monitored by BBC Safety.

### 8.7.2 Procurement

BBC Procurement is responsible for setting standards (the procurement policy) for the procurement of goods and services. The Director of Procurement and Revenue

[http://explore.gateway.bbc.co.uk/buybookorder/bbo/about\\_procurement/procurement\\_team.aspx](http://explore.gateway.bbc.co.uk/buybookorder/bbo/about_procurement/procurement_team.aspx)

Where goods and services are procured centrally they are categorised and managed accordingly via designated Procurement teams. Responsibility for these categories falls under the following posts:

- Head of Sourcing
- Head of Sourcing Goods and Services
- Head of Sourcing Logistics
- Head of Strategic Contracts Group
- Head of Insurance Services

BBC Procurement is supported by Contracts Lawyer (member of BBC Corporate Legal & Intellectual Property team) and BBC Safety department. In addition to the above BBC

Divisional Purchasing Managers also have the authority to procure goods and services within agreed purchasing limits.

Procurement advice and guidance on procuring goods and services is described in BBC Procurement Gateway site:

<http://finance.gateway.bbc.co.uk/procurement/purchasing/main.html>

### **8.7.3 Tendering and Vetting**

Procurement department may undertake some assessment of the competency and safety standards of suppliers this is particularly true of the major strategic suppliers and suppliers appointed through formal tender processes.

However many suppliers can provide a range of services and it is the procuring manager – the person actually making that particular purchase - to determine whether the supplier is capable of delivering those goods or services safely.

Checks on ability to deliver goods and services are performed through Tendering processes which include evaluation of the health and safety management competency of third parties.

For small contracts where tendering is not required then the purchaser is responsible for checking that the third party can deliver the goods or services safely.

Contracts set out any relevant BBC Policy and any specific safety requirements in respect of that contract. A minimum requirement will be for compliance with applicable legislation but more detailed requirements are set when the contract is negotiated on a risk based approach. Higher risks demand higher standards.

As an employer the third party will set their own Policy and Standards but the BBC may ask for some specific standard to be met where this helps the BBC understand the extent to which it meets its own targets.

### **8.7.4 Competency Suppliers Of High Risk Goods And Services For Production**

Where contractors are to be engaged to perform high-risk production activities, only those who meet the relevant vetting criteria may be used. A list of “pre-vetted” contractors for high risk programme activities is available via Gateway.

BBC Safety are involved in the vetting procedure this may include: site visits, evaluation of tendering responses and reviews of third party proposals for goods and services.

An A-Z list of approved production contractors can be found on the BBC intranet Gateway site, BBC Procurement:

[http://finance.gateway.bbc.co.uk/procurement/production/production\\_resources.html](http://finance.gateway.bbc.co.uk/procurement/production/production_resources.html)

### **8.7.5 Monitoring of Third Party Performance and Compliance**

Arrangements are in place to ensure that third parties are monitored to ensure that they meet the requirements set in contracts. Monitoring is proportionate to risk. High value or high risk contracts receive a higher level of monitoring than low risk low value contracts.

Risk is deemed to be highest where it may involve significant risk of harm to BBC personnel or to its assets. Risk is lowest where the third party activity involves administrative functions and

where there is little or no direct impact on the safety of BBC staff or its assets. Monitoring may also take account of reputational risk which may be significant even in the absence of direct risk to BBC personnel.

If a third party is expected specifically to meet a BBC objective then this will be made clear in the contract. For some contracts it will be sufficient only to record lapses in standards for higher risk contracts a specific monitoring

Contracts will also be used to define any other measurement and monitoring activity that needs to take place to ensure that a third party is delivering goods and services to the BBC safely and without risk to the health of those affected by the BBC's undertaking.

The monitoring of the use of procured goods and health and safety performance of procured services in the workplace or in activities is the responsibility of BBC Divisions. Issues of concern should be raised with BBC Procurement.

### 8.7.6 Strategic Contracts - The Star Board

The Strategic Relationships (STaR) Board is made up of senior executives involved in the management of the BBC's high value outsourced contracts. Their purpose is to:

- Create opportunities for savings/deliver further value
- Work together on common issues across our major contracts
- Map and prioritise interdependencies and risks across these contracts
- Share information and best practice
- Manage succession planning

[http://explore.gateway.bbc.co.uk/buybookorder/bbo/about\\_procurement/strategy\\_and\\_approach/star\\_board.aspx](http://explore.gateway.bbc.co.uk/buybookorder/bbo/about_procurement/strategy_and_approach/star_board.aspx)

Strategic contracts are kept under high level review by "the STaR Board" each of these major contracts has separate monitoring arrangements in place which are determined by the nature of the service provided and by the risk associated with that third party activity.

Contract	Arrangements/forum for h&s monitoring/reporting
Capita (Audience Info Service)	Low risk
Red Bee (Broadcast services)	Quarterly safety report sent to BBC Safety. Reviewed by BBC Safety, procurement, and 1 <sup>st</sup> option as safety advisers to Red Bee . concerns raised with contract board
SES Astra (Digital Satellite Services)	Low Risk
Associated Press (ENPS)	Low Risk
Sky (Electronic Programme Guide)	Low Risk
JCI (Facilities Management) and Balfour Beattie Workplace (BBW)	Monitored by BBC Workplace. client team in workplace have safety performance as a very high priority and follow up on safety issues on a daily basis. Workplace Risk Safety Group (WRSG) meet quarterly to review performance by JCI, BBW and other workplace contractors. There is a formal management review of all aspects of delivery annually.
Steria (Finance Services)	Low Risk
Capita (HR)	Low Risk. The Head of BBC Safety is responsible for collecting, analysing and reporting on behalf of the corporation on key health information collected from Capita in respect of the Occupational Health Service.

Contract	Arrangements/forum for h&s monitoring/reporting
Eaga (Targeted help)	<ul style="list-style-type: none"> <li>• programme of monitoring visits to EAGAs centre in Newcastle</li> <li>• Have contracted a consultant to do 40 days of on site H&amp;S visits</li> <li>• Also have some checking that safety was addressed during home visits by "QC" type follow-ups with customers</li> <li>• schedule of quarterly reporting from EAGA to the operations forum</li> <li>• Monitoring arrangements documented by Board paper.</li> </ul>
Siemens (Tech Services)	Quarterly safety report sent to BBC Safety and reviewed by Safety, Contracts team (FM&T) and Siemens Safety team. Performance standards set out in detail as a side letter to the contract.
NGW (Transmission – home, analogue, low powered dig)	
Arqiva (Transmission – home, high powered digital)	
VT Merlin (Transmission – World Service)	Monitored by World Service. Operate 6 BBC owned Overseas transmitters. Operate 4 UK based VT owned transmitters. VT do an annual safety audit of all the sites and this is sent to Jeff. Jeff reviews those audits and also, from time to time visits those sites to verify that the situation on the ground is consistent with the findings of the audit. The audits include information about accidents and although VT do not have to do so, they normally provide information about serious accidents immediately - and this includes information about the sites in the UK. There are monthly and annual review meetings.
Capita (TV licence enforcement)	Monitored by Revenue Management. Monthly board at which Capita give safety information relating to the numbers of incidents on revenue collection agents - this is categorised into verbal and physical assaults and "accidents". brief description of the physical assaults. some information about "initiatives" such as the conflict awareness training. Conduct accompanied visits with staff to confirm that reported H&S processes are in place and are carried out by staff. We also make our own assessments of H&S issues during these visits; Confirm that H&S issues are included in the staff induction process; For all areas visited, Capita classify according to H&S risk and a risk register is in place for addresses where there is a potential H&S issue. .
PayPoint (licence fee collection)	Very low risk – no specific monitoring identified other than reporting of RIDDORs
Proximity London (TV licence – marketing)	Very low risk – no specific monitoring identified other than Reporting of RIDDORs
Revenue Management Services (TV licence – saving schemes etc)	Very low risk – no specific monitoring identified. Other than reporting of RIDDORs
UK Mail (TV licence – postage)	Very low risk – no specific monitoring identified. Other than reporting of RIDDORs

### 8.7.7 Independent Productions

Guidelines for vetting and monitoring of Independent Production contractors are set out in myRisks [Vetting of Indies](#); [Monitoring of Indies](#).

This guidance outlines the BBC's health & safety vetting procedures for Independents. It must be understood and followed by all those involved in the Commissioning process across the BBC. In London this is the Commissioners and Business Affairs Managers, in the Nations and Regions it also includes Commissioning Editors, Executive Producers and Business Executives. Most of the actions will need to be carried out by the Business Affairs Managers or their equivalent in the Nations and Regions.

The information is available to Indies via the commissioning website -

(<http://www.bbc.co.uk/commissioning/tv/business/starterpack.shtml>) and on the external pages of myrisks [bbc.co.uk/safety](http://bbc.co.uk/safety)

A database is kept by the Head of BBC Safety and the commissioners keep their own database which they reference before commissioning or sending out the packs.

The process is the same for TV, Radio and TV interactive.

BBC Safety monitors the safety performance of independent production contractors using a risk based approach – that is the frequency and extent of monitoring depends on the perceived level of risk – a company engaged in, for example, making a programme involving children in adventure activities will have a more stringent regime than one engaged in speech radio.

### 8.7.8 Permit to Work and Control of Contractor Arrangements

Formal Permit to work systems for hazardous operations are in force in BBC premises.

The responsibilities for the permit to work system for activities on or in BBC premises rest with BBC Workplace via Contracts with JCI for London and Scotland and BBW for English Regions..

Local control for the administration of the Permit to Work arrangements and monitoring are through local Permit Office's and the Duty Facilities Manager for the building.

Arrangements for the Control of Contractors and permits to works are detailed in documents held with BBC Workplace Operations and local Permit to Work offices on BBC sites and within the 'Contract of Services' document under which the third party contractor was procured by the BBC.

Monitoring for the management and compliance with these arrangements is carried out by the Facilities Management provider and reported to the Director of BBC Workplace Operations, the Primary Duty Holder,

## 9 RESPONSIBILITIES

### 9.1 General

Responsibility for health and safety cascades through the Corporation from the Director General to each individual. Responsibilities are allocated based on the principle that you are responsible for the

work under your control, for those working under your control and for the people who are affected by your work. Arrangements are in place to facilitate and support management in meeting their responsibilities.

Generic responsibilities for roles across the organization are found on the myRisks web-site. Individuals will have different responsibilities depending on their role in the BBC. Managers and employees must discuss the job, type of work undertaken and any additional responsibilities that this may produce and record the responsibilities either in job descriptions or through the myRisks-Tools.

## 9.2 Individual Responsibilities

An individual's health and safety responsibilities comprise their basic responsibilities, which depend on their level in the BBC structure, and their job specific responsibilities.

There are seven employee responsibility levels and the same set of basic responsibilities is common to everyone at the same level in the BBC structure, regardless of their divisional focus.

Job specific responsibilities are those which are relevant to the type of work they do and any additional specialist activities that some employees undertake eg fire wardens and first aiders.

For further information please see myRisks.

## 9.3 Defining Responsibilities

Every existing role within a division is assigned an employee responsibility level by lead divisional managers. This defines the basic responsibilities for the role. On recruitment to a new role, the manager responsible must identify the employee responsibility level of that role. The employee responsibility level is recorded on SAP-HR.

From the job description the manager should decide what additional responsibilities are required from the role and these, together with the basic responsibilities, should be discussed with the person appointed to the role and recorded.

# 10 TRAINING, AWARENESS AND COMPETENCE

The Training and Competence Guidelines describes the systems used to identify the health and safety competencies and training needs required to carry out responsibilities at each level and function within the organisation.

The guidelines cover:

- a systematic identification of the H&S awareness and competencies required at each level and function within the organization;
- arrangements to identify and remedy, including induction arrangements, any shortfalls between the level currently possessed by the individual and the required H&S awareness and competency;
- assessment of individuals to ensure that they have acquired, and that they maintain, the knowledge and competency required;
- maintenance of appropriate records of an individual's training and competency.
- Performance management of H&S training provision shall cover:
  - trainers and their H&S competencies
  - validation of H&S training courses
  - evaluation of H&S training courses
  - measurement of progress against needs.

Specific competencies are held within the relevant topic guidelines held in myRisks-Information.

Training and development are responsible for the development and delivery of in house training.

## 10.1 Training and Awareness

Training and Development provides a structured and comprehensive health and safety training programme which is categorised into eight main areas:

- Induction/Core Learning
- Production General
- Production Audio & Music
- Production Design
- Production Camera Lights
- Production Journalism
- Non Production
- Topic/Role Specific

The specific role and individual responsibilities will determine what training is appropriate. To help individuals and their manager decide what training and development is right, there is a "one stop shop" for information in learn.gateway on all health and safety training courses in the BBC.

Some courses are available online at the desktop, whilst others involve face-to-face classroom learning. The subjects range from general health and safety subjects, through organisational and production risk management to first aid. In addition there is also information available about specialist safety courses such as Hostile Environments, Public Order etc. which are delivered by external experts.

Courses are run regularly and across the whole of the UK. Divisions are responsible for providing their own guidance and training matrices to help managers decide what training their staff should be undertaking.

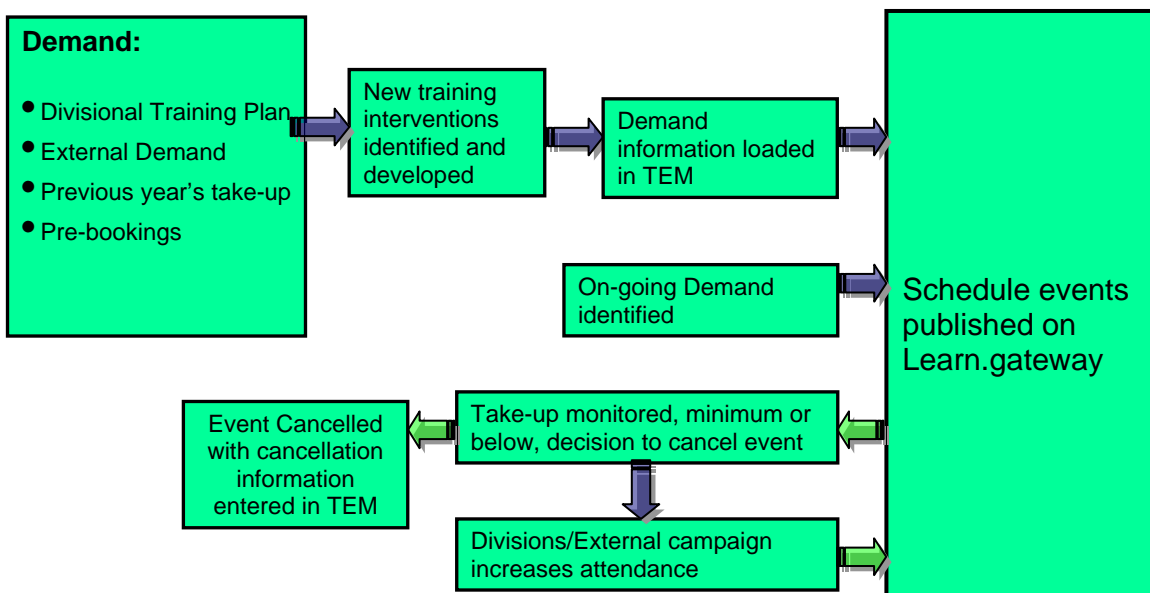
## 10.2 Training cycle

The divisions formulate their individual training demand plans in October/November. Training & Development then calculate the cost of delivering these plans and forward this to the Learning Board for their approval in December.

Once approved the training programme, including health and safety training, is published on learn.gateway in February/March for the following financial year. Formal reviews of the divisional training plans are carried out annually to adjust the schedule in the light of changing business need.

Learn.gateway is underpinned by a live system called SAP TEM (Training Event Management) available through Gateway.

The flow diagram below illustrates the process.



Training records are held on SAP-TEM.

Training requirements reflect the hazards and associated risks and are reviewed by managers on a regular basis, as well as upon recruitment, at activity/job change and on identification of new hazards or change in risks, and revised if necessary.

## 10.3 Training of Freelances

In health and safety terms, freelances who work on BBC productions are treated the same as BBC employees and therefore are required to undertake health and safety training as part of their job role (see Competence). For most production H&S training, this will be centrally funded and therefore at no additional cost to either the production or the individual freelancer.

## 10.4 Mandatory Training

All BBC Staff must undertake Induction training and the BBC Safety at Work online course which includes training about working with DSE course and a DSE self-assessment module. People working in productions news and events but who don't have significant management responsibilities should attend BBC Production Safety Online Course and Safe Management for productions.

People working in Productions, news and events who have significant management responsibilities should attend Design Risk management parts 1 and 2

Gaffers DOPs and Lighting directors should attend safe working with cameras and lights. Those with responsibility for risk assessment should initially undertake risk management for production, News assignment and location safety , BBC Safe management of non productions or BBC safe management of live events as appropriate for their specific role. If they have had prior face to face training then BBC online risk assessment refresher is recommended.

Anyone working in an environment overseas classed as a "Hostile Environment" must undertake the Hostile Environment and First Aid Training  
<http://learn.gateway.bbc.co.uk/Courses/CourseDetails.aspx?CourseID=3385>

## 10.4.1 Production General Training

Production training aims to provide programme makers with an overview of the risk management issues involved in television, radio and/or online production work. Key production training requirements are described on myRisks

<http://explore.gateway.bbc.co.uk/myrisks/default.aspx?Page=3508>

Production training aims to provide programme makers with an overview of the risk management issues involved in programming television production work. In particular it will raise awareness of why and how they need to control production risks; understand better the difference and relationship between risk assessment and risk management; and be clearer about their own role and responsibilities and those of others.

The key training here is the Safe Management of Production course together with the relevant case study. The course is aimed at those working in any production department from producers through to broadcast assistants.

Details of the course(s) can be accessed at:

<http://learn.gateway.bbc.co.uk/Courses/CourseDetails.aspx?CourseID=10246>

## 10.4.2 Journalism Training

Newsgathering and current affairs staff need to understand the areas of significant risk during newsgathering work on location and identify the basic principles of safe management, risk assessment, planning and organisation.

<http://learn.gateway.bbc.co.uk/Courses/CourseDetails.aspx?CourseID=3400>

The key training here is the News Assignments and Location Safety course and the suite of high risk training including Hostile Environments training and Chemical, Biological and Radiological hazards training.

This training has been designed for all News staff both in television and radio to give an overall understanding of what are the basic acceptable safety criteria when working on location both

domestically and abroad and to apply the principles of assessment set out in the journalism safety guide.

Details of the course(s) can be accessed at:

<http://learn.gateway.bbc.co.uk>

### **10.4.3 Non Production Training**

Non Production training aims to provide non programme makers with an overview of the risk management issues involved in their support of productions. In particular it will raise awareness of why and how they need to control non production risks; understand better the difference and relationship between risk assessment and risk management; and be clearer about their own role and responsibilities and those of others.

The key training here is the Managing Safely course. The course is accredited by IOSH (Institute of Occupational Safety & Health).

Details of the course(s) can be accessed at:

<http://learn.gateway.bbc.co.uk>

### **10.4.4 Topic/Role Specific Training**

In support of general production work are a number of role specific and topic related health and safety training. These fall into the main categories of general office, first aid, electrical, manual handling, noise, and facilities management.

Details of the course(s) can be accessed at:

<http://learn.gateway.bbc.co.uk>

### **10.4.5 Refresher training**

Refreshment periods for training is separately identified for each course.

All staff are given training reviews during the appraisal process by their Line Manager on an annual basis and appropriate action taken to identify and remedy any shortfalls through development and delivery of a training plan.

Training requirements of individuals are identified by the line manager, taking into account differing levels of responsibility, ability and risk. Plans to meet the training needs identified, to defined specifications, are produced and implemented

The responsibility to identify the need for new courses / modules lies with Line Management and HR, in consultation with the BBC Safety department.

### **10.4.6 Evaluation of Training Effectiveness**

Evaluation is done in several ways using the methods below;

- close monitoring of the percentage of people who had completed core safety courses
- completion of qualitative feedback forms by course participants on stand alone courses.
- some form of quantitative monitoring e.g. short question set to establish what candidates have learnt from course for stand alone courses (the interactive course already does this).

- monitoring of staffs' work activity, in terms of safety competence, on completion of training.
- Inclusion as part of assurance monitoring schemes

# 11 Communication and Consultation

## 11.1 Internal Communication

Health and safety communications are distributed using a number of routes:

- the BBC internet, <http://www.bbc.co.uk/safety>
- the BBC Gateway intranet, specifically the myRisks-Information site Safety News
- health and safety briefings issued by the operational safety advisors to the appropriate targeted audience.
- Management and safety forum meetings
- Safety alerts highlighting matters needing urgent and non-routine action. Safety Alerts may, on the decision of Head of Safety be distributed for information outside the BBC.

Additionally, information on the policy statements and guidelines are published on myRisks-information Local procedures are held on individual intranet sites.

Specific articles and issues may also feature in 'Ariel' the company newsletter, through the team briefing process and at local and national health and safety forums.

Responsibilities are communicated through the myRisks-tasks responsibilities module. Business Units, through induction, make all employees aware of their responsibilities for health and safety and where to get information and guidance via their line manager, appointed safety representative, BBC Safety department, myRisks-information and myRisk-tasks.

The BBC Manager, including Producers/Editors, in charge of an activity for which any contractor is engaged are responsible for co-ordinating the contractors work with the activities of the BBC, and the exchange of information on risks and controls.

## 11.2 External Communication

The BBC plays an active role in a number of industry and professional forums such as the Joint Advisory Committee for Entertainment (JACE), Broadcast Industry Safety Group (BISG), CBI Health and Safety Panel, the Safety, Health, Environment inter-industry Benchmarking Association (SHEiBA), HSE working groups etc.

## 11.3 Enforcing Authority Contact & Liaison

Contact, including correspondence from any enforcing authority, (including the Health and Safety Executive (HSE), local authority Environmental Health Officer or Fire Officer, and Consultants in Communicable Disease Control) must be notified to BBC Safety department by the quickest possible means. The BBC Safety department will provide managers with the appropriate support and advice.

Any person needing to contact the enforcement authorities listed above, on other than on-going business, must liaise with BBC Safety department to facilitate the approach and monitor the outcomes from any contact. For arrangements outside the UK, BBC Safety will advise on the relevant arrangements needed.

### 11.3.1 Consultation with Staff

The BBC's relationship with the trade unions is in part set by a framework outlined in the Procedures agreement and Agreed Statements. These are available on the Gateway and include the BBC's Safety Procedures agreement. The Safety Procedures agreement acknowledges a common aim in ensuring health and safety at work. The arrangements for consultation on health and safety issues are set out in Health and Safety Consultation Managers' Guidelines which are published on the myRisk-Information site on Gateway intranet.

The recognised unions represent all BBC employees for the purposes of formal consultation on matters of health and safety. Local arrangements to ensure compliance with the Guidelines are identified in Divisional Organisation and Arrangements.

The national safety representatives meet with BBC managers quarterly through the Corporate Consultative Committee for Health Safety and Welfare.

## 12 Operational Risk assessment and Control

It is the responsibility of the head of each business unit to ensure that formal, systematic assessments are made of all activities, of the equipment and materials used for those activities and of the locations where the activities are carried out in accordance with the risk assessment guidelines (ref myRisks) and defined responsibilities.

Each business unit will also be responsible for creating control measures appropriate to their risks.

Relevant professional support should be consulted before any high risk or complex activity is undertaken. The essential requirement is that at any time the Manager responsible for the work activity is able to demonstrate:

- a suitable and sufficient risk assessment has been carried out, in good time and for every stage, for all risks associated with their work (**see note below**)
- the necessary controls identified have been put in place
- effective communication of significant findings to those who may be affected by the activity
- that assessments are recorded and reviewed in the light of change
- that the controls continue to be appropriate and in place.

All those involved in the activity, including the manager responsible for the workplace, will provide relevant information to inform the risk assessment process and will co-operate with those responsible to ensure appropriate controls are successfully implemented.

**Note:** *By making maximum use of corporate and divisional generic assessments for routine activities which can be well defined the number of separate risk assessments needed to be recorded is reduced significantly.*

*Staff undertaking routine activities do not have to produce a separate risk assessment but will have to understand through training and information what safety measures ('controls') need to be taken for the activity they are undertaking and ensure those are applied. This approach is backed up by comprehensive safety guides for each area (Journalism, Vision, A&M etc) specifying which activities are covered by a generic risk assessment, what controls need to be applied, and when a separate risk assessment (for example for a complex or high risk production) needs to be done.*

Monitoring of the completion and sufficiency of risk assessments is a key role of the divisional safety forums as part of the divisional active monitoring process.

## 12.1 Working Overseas

A special category of risk is regarded as being the BBCs work overseas. The arrangements for control of safety overseas are described here.

### 12.1.1 International Work

The BBC is an international organisation that deploys staff around the world. Over 2,000 staff work outside the UK in more than 90 countries. The BBC owns and controls over 120 offices and broadcasting facilities outside the UK. As far as it is reasonably practicable, BBC Policy, arrangements and requirements apply to wherever BBC employees are based or directed to work in the UK or overseas. The BBC aims to ensure that work is carried out safely, with minimal impact on the environment and without contravening local legislation and provides organisational and practical support to assist in this aim.

### 12.1.2 Deployment to High Risk Countries

The BBC identifies areas outside the UK where there is particularly high risk as a result of war, conflict or natural phenomena and categorises these as 'hostile environments'. Special arrangements are put in place to ensure work in such areas is properly assessed, controlled and coordinated. The specific procedures for working in Hostile Environments are available on Gateway as part of the High Risk Guidelines.

<http://home.gateway.bbc.co.uk/myrisks/main.asp?page=4568>

For all work on location and in the field, there are arrangements in place through the BBC Safety department to provide security, travel and health advice as part of the risk assessment and the control of risks.

Divisional arrangements also detail specific arrangements and requirements for risk assessment where appropriate.

<http://home.gateway.bbc.co.uk/myrisks/main.asp?page=4569>

### 12.1.3 International Offices

<http://worldservice-bcrm.national.core.bbc.co.uk/ioid/maps/InternationalMap.aspx>  
 BBC offices are located in a variety of countries with different levels of local infrastructure. The BBC recognises the difficulty of working in some areas and, through the International Offices Steering Group (IOSG) led by World Service, has set standards for health and safety in all international premises. International offices are owned and managed by the following Divisions:

- World Service
- BBC Monitoring
- World Service Trust
- World
- Worldwide
- Newsgathering
- BBC People

A guide to international standards, the International Health Safety, Security and Business Contingency Guide published in March 2006 through World Service and the IOSG has been made available to all international premises with the aim of ensuring the adequate management of safety, health and security of the premises and staff permanently or temporarily based in those premises.

This guide known as the Green Book gives guidance and sets standards on all applicable health and safety topics in a practical way that promotes reasonable achievable standards. Forms and templates, training and support are also made available to international offices staff.

<http://worldservice.gateway.bbc.co.uk/dandt/bcrm/guide/hs/hs.htm>

At present not all BBC premises have direct access to training and the Gateway site because of infrastructure difficulties. Where this is the case the International Health Safety, Security and Business Contingency Guide has established alternative routes and methods to meet the standards in the guide.

For all international premises, individuals with overall responsibility for control of each site will be identified and site details recorded on the International Offices Database IOD. Where required, additional support to achieve and maintain acceptable standards will be made available through BBC Safety and the technical topic experts.

The BBC has set standards based on UK legislation, where a higher or additional standard exists in country, this must be complied with. Where appropriate, resources to establish local legislation will be made available through BBC Safety or the lead Divisions.

#### **12.1.4 International Health and Safety Support**

BBC Safety provides support to international operations through Divisional safety advisers, specialist advisers, health provision and the information and training infrastructure. Not all of these options are directly available or applicable to international offices. In these cases, alternative arrangements are in place through the International Health Safety, Security and Business Contingency Guide, individual advisers and topic specialists.

#### **12.1.5 Audit and monitoring of Overseas Workplaces**

Besides standard monitoring arrangements, periodic reviews of all BBC international offices are carried out to ensure common standards and implement the most cost effective solutions in resolving problems. The reviews are structured to cover health, safety, security and business continuity and are intended to gather background information on each site as well as giving advice and support to local managers in meeting their obligations.

## 13 EMERGENCY PREPAREDNESS AND RESPONSE

### 13.1 Introduction

The arrangements for emergency prevention, preparedness and response are published on the myRisks-information intranet site. These arrangements identify the potential for accidents and emergency situations, and address the prevention of health and safety risks associated with them.

The arrangements cover the following areas:

- disaster and business continuity planning
- incident reporting, investigation and management procedures
- first aid
- fire
- high risk incidents eg major earthquakes.

and include

- defined lines of communication and escalation and associated responsibilities
- ensuring the procedures, instructions, equipment and associated data contained within the Plan are maintained or amended regularly to ensure accuracy
- carrying out exercises to test the effectiveness of the Plan
- agreeing the provision of services in their Plan with the appropriate service providers
- briefing/training premises staff on the Plan, particularly those with a role to play
- ensuring relevant staff/contractors are provided with a copy of the Plan
- having a nominated person to maintain the Plan and distribute amendments
- exercising the Plan to ensure its continued effectiveness by learning from experience.

Business Units are responsible for:

- ensuring development and maintenance of emergency plans
- ensuring their own staff are aware of the plan, are suitably trained and co-operate fully in its execution
- ensuring their visitors, contributors, and contractors follow any instructions regarding evacuation and emergency relocation.
- identifying the need for and establish emergency teams to take action in emergencies and ensure that responsibilities are assigned to team members.

### 13.2 UK Emergencies

Emergency information is provided at <http://home.gateway.bbc.co.uk/159/main.asp?page=6>

### 13.3 International Emergencies

Arrangements are in place to manage international emergencies. The BBC Insurance Department, manages a Travel Assistance programme which provides 24 hour world wide medical emergency advice to employees working abroad and medical evacuation of expatriate staff from any part of the world accessible to civilian transport. Contingency plans exist in case of detention or kidnapping of staff including internal crisis management procedures and the retention of external specialist support. Similar procedures would be activated for other emergencies such as a threat to overseas operations or the need to evacuate staff from a particular area.

Overseas operations in hostile environments or other high risk circumstances are the subject of specific risk assessments which specify these contingencies. The BBC's High Risk Team and Occupational Health will advise whether separate additional arrangements are needed, for example for assignments to areas where there is no communication infrastructure. The arrangements and contact details for the medical service provider are available via Gateway. In the event of the service

being used the manager must inform Insurance who will alert the High Risk Team and Occupational Health who will monitor the progress of each case.  
(See also section 3.3 - Working Overseas)

## 13.4 Business Continuity and Disaster Recovery Team

Key personnel within each division have responsibility for business continuity and disaster recovery, ensuring plans are prepared and rehearsed. Across the BBC, these people make up the Business Continuity & Disaster Recovery Team, the BCDRT, which meets every 6 weeks.

The Business Continuity Unit is responsible for co-ordinating the BBC's response to any major incident, working with the BCDRT as the hub of the BBC's emergency response.

The of BCDRT is described on page 29. The head of BBC Safety, Head of Corporate Security and Chief Medical officer provide support when required to the BCDRT on any aspect of Health, Safety or Security.

# 14 MONITORING & REPORTING

## 14.1 Responsibilities for Monitoring

Responsibility follows the line management structure so that checking of local controls will usually be done by local managers whilst checking of strategic control measures will be done by senior managers. Table 1 gives guidance on indicative responsibilities and frequencies to assist divisions in determining their local monitoring arrangements.

Checks which look at the corporation as a whole will usually be done by senior management through the Executive Board, BDG, and BSC and independently through the audit function of Business Assurance.

Management boards and safety forums should monitor on a quarterly basis the following:

- Accidents/Incidents (headline trends, investigation and closure analysis),
- progress against divisional action plan
- analysis from active monitoring including management arrangements, inspections, assurance monitoring, responsibilities, training and risk assessments
- Suspected work related ill health
- contractors and partners performance
- key risks and issues including significant projects and legal and other changes
- Issues from other forums (ie Actions)
- Issues to be escalated to other forums (recommendations)
- key audit items

The amount of monitoring that needs to be done i.e. the frequency and depth of measurement will depend on several different factors, including:

- mandatory monitoring requirements with defined maximum intervals
- the degree of risk associated with the particular location/activity
- the likelihood of accidents/incidents occurring
- individual BBC requirements.

Monitoring responsibilities for all levels of management are defined in myRisks – Responsibilities. In addition individuals at any grade may be assigned specific monitoring, measuring and reporting tasks. Key monitoring arrangements should be specified in the Divisional Arrangements.

Guidance on monitoring can be obtained from the Monitoring Guidelines published on myRisks-Information. The guidance includes a list of the sort of performance measures that Divisional Safety forums might use as a basis for monitoring and guidance on the planning, recording and reporting

as well as review frequencies. Each Division is responsible for ensuring there are adequate arrangements for monitoring the health and safety standards, arrangements and compliance within the Division

Monitoring extends not only to activities directly under the control of the BBC but also to those undertaken by third parties.

The BBC's overall performance against indicators are collated and reported at each BSC meeting by the BBC Safety department. This is reviewed annually by the BBC Safety Committee (BSC) and changes for the following financial year determined. Health and safety performance reports are provided quarterly by BBC Safety for consideration by the BBC Executive Committee and by the Audit Committee of the Board of Governors.

## 14.2 Proactive Monitoring

Proactive monitoring includes:

- monitoring of the achievement of specific plans
- achievement against agreed performance targets and objectives;
- performance against identified actions eg no. outstanding/no. complete/effectiveness
- the systematic inspection of work systems, premises, plant and equipment; including eg no. inspections carried out against plan/no. of non-conformances found per inspection
- assurance monitoring
- employee surveys looking at the working environment, including work organization;
- surveillance of workers' health, where appropriate, through suitable medical monitoring or follow-up of workers for early detection of signs and symptoms of harm to health in order to determine the effectiveness of prevention and control measures;

Proactive monitoring should be proportional to the hazard profile and include activities undertaken by third parties (see section 5). Activity should concentrate on areas where it is likely to produce the greatest benefit and lead to the greatest control of risk. Key risk control systems and related workplace precautions should therefore be monitored in more detail or more often (or both) than low-risk systems or management arrangements.

## 14.3 Reactive Monitoring

Reactive monitoring includes the identification, reporting and investigation of:

- work-related injuries, ill health (including monitoring of aggregate sickness absence records), diseases and incidents;
- other losses, such as damage to property;
- deficient safety and health performance,
- health and safety risk management system failures;
- workers' rehabilitation and health-restoration programmes;
- adverse publicity, prosecution.

Divisional arrangements should ensure that a follow-up procedure is established and operated to track the progress of actions arising out of the monitoring processes.

### 14.3.1 Reporting & Investigation of Accidents & Incidents

The incident reporting guidelines set out the arrangements to ensure that all accidents, including near misses, that occur during the course of the BBC work are reported promptly and investigated to determine lessons learned.

The reporting and investigation procedure is mandatory and provides essential information to:

- ensure action is taken to prevent recurrence
- meet statutory requirements
- help monitor and improve health and safety performance
- provide information for responding to claims made against the BBC
- enable the BBC to respond quickly and accurately to external enquiries

The Social Security Act requires the BBC to provide employees with another opportunity to record injuries received at work, if they so wish. This is a voluntary system. It is independent of the BBC's arrangements for reporting accidents for safety purposes. The BBC Accident Form is available where people can easily access it, for example, at reception at each premises for such recording purposes.

Where situations or activities are identified which resulted in an accident/incident, a thorough investigation followed by effective action will take place. The investigation will focus on the root causes of the accident/incident, with the corrective action aimed at removing these causes in order to prevent recurrence.

The reporting of incidents is the responsibility of the individual or individual's line manager and should be done through the myRisks on line reporting system. See myRisks-information, Guidelines on incident reporting and investigation. (link). Incidents that are required to be reported under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) are reported using the prescribed methods by the BBC Safety department.

Primary responsibility for the investigation of incidents to identify underlying causes and corrective action falls to the line manager of the injured person or to the person responsible for the activity as appropriate depending on the circumstances.

## 14.4 Reporting Of Performance

### 14.4.1 Executive Level Reports

The Head of BBC Safety is responsible for the monitoring of corporate wide issues on behalf of the executive. BBC Safety collects measurement information which is pertinent to the corporation as a whole including accident figures, progress against training plans and achievement of corporate wide actions. BBC Safety is responsible for the management and development of the necessary tools for the collection of the relevant health and safety data.

Divisions are expected to provide assurance that activities for which they are responsible are being monitored and that evidence is collected to demonstrate that they are being undertaken safely. See monitoring guidelines

### 14.4.2 Annual Report

The head of BBC Safety is responsible for providing health and safety performance information for the BBC Annual Report and Accounts. The annual report is publicly available.

### 14.4.3 Executive Reports

#### 14.4.3.1 Quarterly Review

The head of BBC Safety is responsible for the preparation and publication of a quarterly report. The report is presented to BSC and its content with respect to health and safety is shared with staff through the Corporate Consultative Committee for HS&W. Discussion of the report is a standing agenda item for every BSC and CCC HS&W meeting. The quarterly review provides the source of the majority of information provided to the Executive Board and BDG through the Compliance and Risk Reports.

Each quarter the Policy and Compliance team in BBC Safety prepares a summary of key issues and relevant performance data based on data held in the myRisks system at a corporate and Group/divisional level. These templates are further tailored by Safety Managers for submission to Divisions via divisional safety forum meetings.

Recommendations within the report or arising out of BSC discussion of the report are either referred to Divisions for Action or to the Executive Board.

#### 14.4.3.2 Annual Risk Baseline Report and 6 Monthly Updates

The Head of Corporate Finance is responsible for the preparation and publication of a report to the BBC Direction Group for action and the Executive Board for discussion. The report sets out a summary of all the BBC's key risks including those relating to health and safety risk. The Health and safety element of the report is prepared by BBC Safety and agreed by the Director of BBC People.

Divisions prepare a register of their most significant risks on a corporate tool "Magique". Each quarter, Key Risk Owners through their senior managers prepare a report on the management of the risks for which they are responsible. Head of Business Assurance reviews the Divisional Submissions and prepares a summary report for the BDG and Executive Board. The Annual Risk Baseline (ARB) report is delivered in May each year and presents a detailed view of the BBC's risks. Three quarterly updates highlight key changes since the ARB, the most significant continuing risks and indicating the change in status quarter on quarter.

The Annual Risk Baseline Report and 6 monthly updates contain as a minimum:

- The overall status of each of the BBC's Key Risks identified by a five scale colour code.
- The movement in the quarter identifying whether the risk status is perceived to be increasing, static or decreasing.
- The significant emerging risk issues and actions being taken.
- Those issues where if unchecked there is a **risk** of breach of a legal responsibility are denoted with an icon labelled 'legal breach'.

#### 14.4.3.3 Annual Compliance Report and Quarterly Updates

General Counsel prepares for The Executive Board an annual report, with quarterly reviews on legislative compliance which includes issues related to health and safety. The annual compliance report is also submitted to the BBC Trust. The Head of BBC Safety is responsible for the preparation of the health and safety content.

The Executive Board endorses the report for onward progression to the trust. Health and safety information in the report consists as a minimum of:

- A summary of key issues together with a summary of mitigating action
- A summary of incidents
- Trends in incidents and performance against relevant targets
- Trends in ill-health and performance against relevant targets

#### 14.4.3.4 Audit reports

The Executive Audit Committee receives a quarterly summary report on the findings of internal audits, including those concerning health and safety. The head of Business Assurance is responsible for the preparation of the content. The report sets out a summary of the Audit Reports issued since the previous report and highlights the key themes arising from the audit reports and outlines planned audit activity.

The report includes as a minimum

- A list of recent audit reports
- A summary of key themes
- A summary of each reports findings
- A summary of the next quarters planned audit activity

The Executive Audit Committee receive an annual summary report detailing the audit plan for the following year. The audit plan is agreed by the Executive audit committee and passed to the Executive Board for noting and comment.

### 14.4.4 Divisional Reports

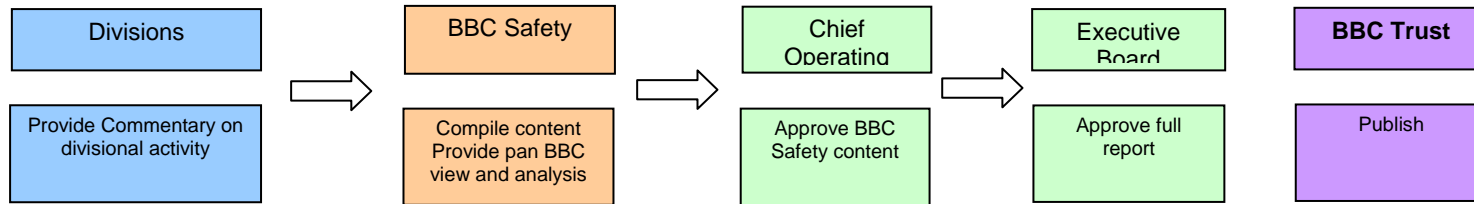
Divisional senior management receive more detailed information about activities within their own divisions, in particular details on the implementation of divisional action plans, evidence to demonstrate that their activities are being undertaken safely; and divisional trends in performance information. The divisions are responsible for the collection and consideration of Information on the safety performance of third parties where the division has responsibility for management of the relevant contract.

Preparation, analysis and publication of divisional reports is the responsibility of the divisions and is documented in the divisional arrangements. Responsibilities for monitoring actions arising from the reports are also defined. BBC Safety assists in the provision of information which is held corporately (see 14.4.3.1)

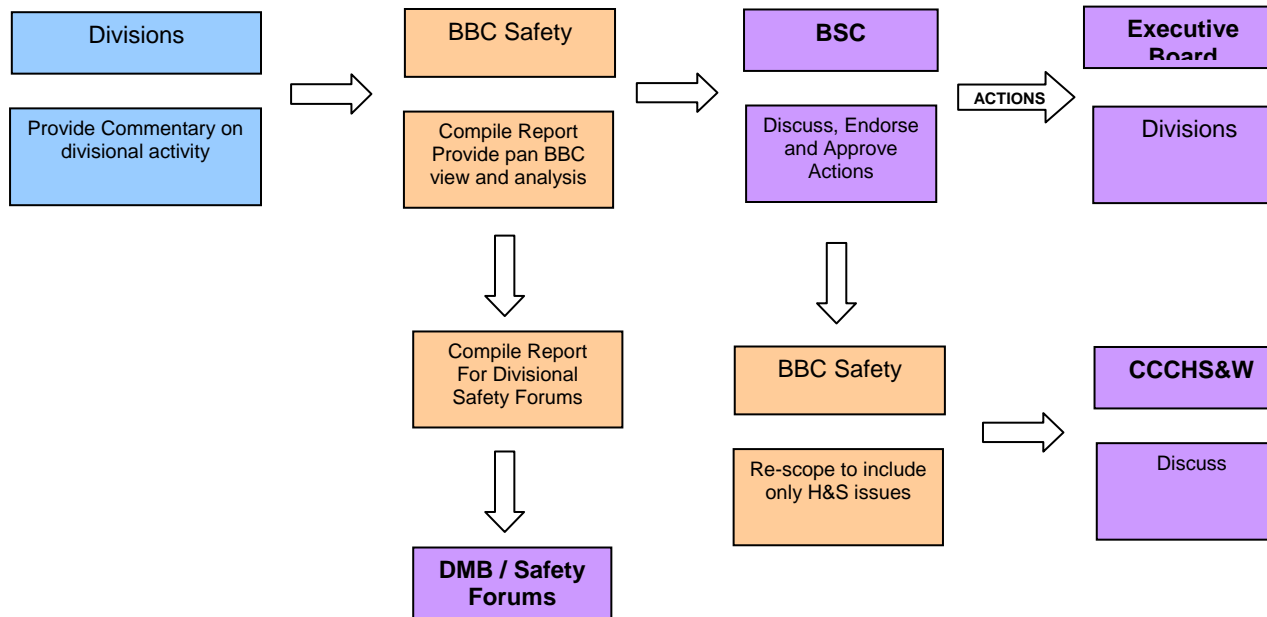
Specific reports are held within myRisks tasks as well as the query function capability of myRisks across all the modules. Reports are also generated from Magique

The content of divisional reports may be used to inform the preparation of the executive reports detailed above

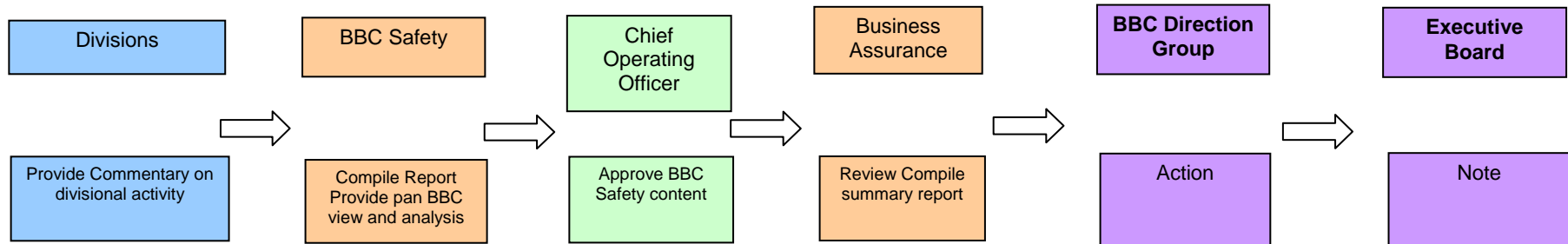
## Annual Report



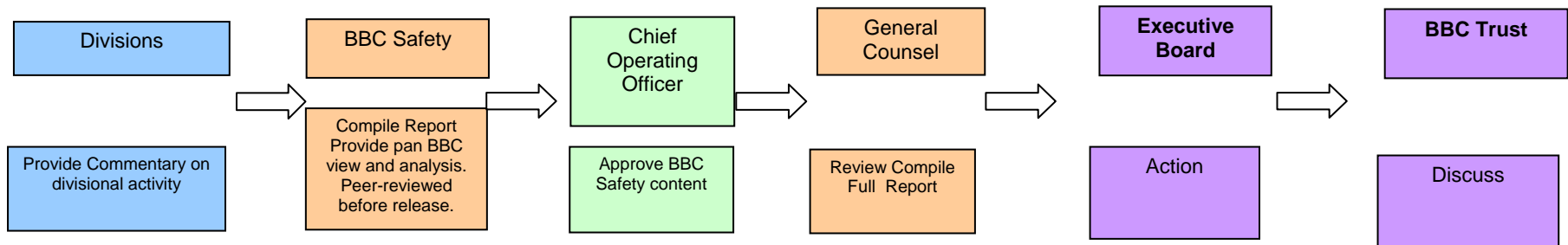
## Quarterly Review



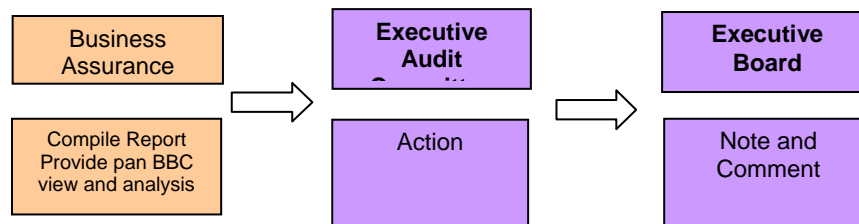
### Annual and 6 Monthly Risk Report



### Annual and Quarterly Compliance Report



### Quarterly Audit Reports and Annual Audit Plan



# 15 INFORMATION, DOCUMENTATION AND RECORD MANAGEMENT

## 15.1 Information

Managers and staff have ready access to health and safety information through Gateway, the BBC Intranet. For activities away from base, managers should ensure that the relevant information needed is provided and is current (For example by using paper copies of relevant documents or CD ROM of the Gateway site which is produced by BBC Safety on a quarterly basis). In addition the health and safety requirements and supporting guidance are available via the [BBC.co.uk/safety](http://BBC.co.uk/safety) internet site although some sensitive material ( phone numbers and high risk country pages) are excluded from the external site.

BBC Safety department utilise a number of on-line information services for health and safety related reference material appropriate to BBC work activities. The information on these is held by the Safety Policy and Compliance Team.

## 15.2 Record Keeping

BBC health and safety guidelines and Divisional arrangements will specify where records relating to health and safety must be kept. This will include the retention of significant findings of risk assessments, health records and accident and investigation reports and records of training.

All records will be satisfactorily stored at all locations in an environment which will protect them from damage, loss and/or deterioration and allow easy retrieval. Health and safety records are entered onto the corporate Retention Schedule as part of the compliance with the Records Management Policy. [http://guidelines.gateway.bbc.co.uk/dq/media\\_management/records\\_management.shtml](http://guidelines.gateway.bbc.co.uk/dq/media_management/records_management.shtml)

## 15.3 Documentation and Document Control

Health and safety documents published on the BBC Safety Intranet site are managed through the BBC Safety editorial process. The editorial process includes the approval steps and is the responsibility of the Head of BBC Safety.

BBC Safety documentation is reviewed, as a minimum, every 2 years on a rolling programme Whenever, for any reason, a document becomes invalid (e.g. the activity may no longer be carried out etc.) its removal is formally approved by the document's authorising body or the Head of BBC Safety.

Technical Standards and Guidelines will contain within them procedures which explain why the activity must be carried out, what, when, how and where it is to be done, and by whom it is to be carried out.

All divisional documentation must be compliant with the relevant corporate documentation.

## 15.4 Editorial Process

The author/reviewer of corporate documents will comply with the requirements set out in the BBC Safety Editorial Procedure.

The Editorial Procedures include:

1. guidance to authors on the key requirements to ensure documents meet the needs of OHSAS 18001
2. the document control and management arrangements and responsibilities eg identification, development, referencing, approval & authorisation, distribution
3. frequency of review
4. arrangements for consultation and communication
5. arrangements for determining the impact of change

## **15.5 IT and Electronic Data Control**

The security of data, storage and archiving of data are managed through a Service Level Agreement with Siemens according to their own protocols. This also covers a formal procedure for the updating and amending of the myRisks I.T. system.

## 16 AUDIT

### 16.1 Audit Responsibility

Audits are carried out by BBC Business Assurance, or other independent group as part of the arrangements for monitoring. The scope and focus of health and safety audits are subject to consideration by BSC. Audit will normally be conducted independently of the business unit or activity which is the subject of examination. Divisions are required to afford proper co-operation.

Business Assurance is responsible for drawing up and carrying out an audit plan which prioritises key areas of risk. The audit process are described in the BBC Internal Audit Manual which covers the key aspects of the audit process covering:

- the identification of auditing requirements
- the planning of audits through to the structured collection of independent information on the efficiency, effectiveness and reliability of systems for managing health and safety
- the drawing up of recommended actions, monitoring and review of performance in deliver of these actions.

### 16.2 The Audit Plan

The annual audit plan includes all the audits and reviews planned to be undertaken within the financial year by the Internal Audit team. The proposed annual plan is presented to the BBC's Audit Committee for approval.

The overall plan is subject to amendment in light of continuing discussions within the business to highlight priorities for gaining assurance and the changing risk profile of the BBC.

#### 16.2.1 Selection of audit areas using a risk based approach

The approach taken to identify these risk-based audits has been through a review of the risk registers, discussions with key business contacts and forums, and results of previous audit work. A business area or process may be selected due to the following:

- Where a high level of risk is associated with an area, project, process or system which may be business critical (specific risk areas are identified and defined below).
- The success of a project is vital to the achievement of the BBC's objectives and the project faces or poses risks in the categories listed above.
- To follow up on previous control recommendations.
- It is recognised as a significant area for which no review has been recently conducted.
- The area is undergoing significant change.
- Where a possible control weakness has been identified, for example, following the external audit by KPMG or PricewaterhouseCoopers (see below) or a fraud risk has come to light.
- A request from BBC's Audit Committee for a review.

#### 16.2.2 Joint reviews with external audit or in compliance with external regulation

Internal Audit jointly undertakes work with external auditors which seek to provide assurance as part of the external audit process. Internal Audit also conducts reviews across the BBC as a response to external regulations and developments as required.

Key reviews include:

- Financial audit (KPMG): as part of KPMG's process driven audit approach, these interim reviews seek to provide assurance over the processes key to the financial statements.

The purpose of these reviews is to ensure the processes are adequately controlled and transactions are accurately recorded.

- Fair Trading audit (PricewaterhouseCoopers): These reviews assess the adequacy of the systems, procedures and controls in place across the BBC to ensure compliance with the Commercial Policy Guidelines and the BBC's Fair Trading Commitment.
- Technology Governance: as part of KPMG's control environment work, these reviews seek to provide assurance regarding the governance and management of technology across the BBC to ensure that Technology delivers value and enables the business, and that technology-related risks are mitigated.

## 16.3 Audit Recommendations

Progress against approved audit programmes are subject to periodic monitoring and review by the audit committee. Progress against agreed audit recommendations is monitored at Divisional and Corporate level (BSC).

## 17 REVIEW OF PERFORMANCE

The adequacy of health and safety performance and the suitability, adequacy and effectiveness of arrangements for the management of health and safety need to be assessed and actions necessary to remedy deficiencies and effect improvements need to be taken.

### 17.1 Management Review

Review is carried out at all levels of management of the organisation from the Board reviewing overall health and safety management to a front line manager reviewing the effectiveness of supervisors' actions to remedy sub-standard practices and conditions. Reviewing should be a continuous process undertaken at different levels within the organisation. It includes responses:

- by first-line supervisors or other managers to remedy failures to implement workplace
- precautions which they observe in the course of routine activities;
- to remedy sub-standard performance identified by active and reactive monitoring;
- to the assessment of plans at individual, departmental, site, group or organisational level;
- to the results of audits.

Divisions should decide on the frequency of the reviews at each level and devise reviewing activities to suit the monitoring and auditing activities. In all reviewing activity the result should be specific remedial actions which establish who is responsible for implementation and set deadlines for completion. The Divisions senior management will record the arrangements for management review for their Divisions.

The BBC Executive (BDG) will receive an annual health and safety review report of the BBC's performance and progress prepared by the BBC Safety department. This will include the results of the monitoring and review by Divisions as set out in the Monitoring Guidelines. This is designed to help answer two questions:

1. Is the BBC getting the basics right?
2. Is it making and sustaining progress and continual improvement?

These results and other internal and external influences including reorganisation, new legislation or changes in current good practice, can result in redesign or amendment of any parts of the health and safety management system or a change in overall direction or objectives.

Key performance indicators for reviewing overall performance shall include:

- assessment of the degree of compliance with health and safety system requirements;
- identification of areas where the health and safety system is absent or inadequate;
- assessment of the achievement of specific objectives and plans; and
- accident, ill health and incident data accompanied by analysis of both the immediate and underlying causes, trends and common features.

### 17.2 Continual improvement

The management review processes, outcomes and actions should feed into the continuous improvement cycle for the management system as a whole and should take into account:

- (a) the health and safety objectives of the organization;
- (b) the results of hazard and risk identifications and assessments;
- (c) the results of performance monitoring and measurements;
- (d) the investigation of work-related injuries, diseases, ill health and incidents, and the results and recommendations of audits;
- (e) the recommendations for improvement from all members of the organization, including the relevant committees;
- (f) changes in national laws and regulations, voluntary programmes and collective agreements;
- (g) new relevant information; and
- (h) the results of health protection and promotion programmes.

## 18 Change Log

Date	Change	Change By	Sign Off?
Nov 2010	Revised description of third party arrangements. Change order of some sections.	Richard Perry	Not required. No substantive change