

ICO Health and Safety Policy Parts 1 and 2

Part 1 – Statement of intent

Part 2 – Organisation and Responsibilities

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Key messages

The main objective of this policy is to provide:

- A statement of intent with regard to Health and Safety from the Chief Executive Officer as a senior executive in the organisation.
- A description of the arrangements for overseeing health and safety matters at the ICO.
- Details of the health and safety responsibilities for specialist roles, managers and staff.

Does this policy relate to me?

This policy is relevant to all managers and staff at the ICO as it describes the responsibilities of each person in the organisation.

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1. Introduction

- 1.1. Health and Safety Policies are structured in to three components:
 - i) A statement of intent from a senior officer in the organisation
 - ii) A description of the roles and responsibilities of people within the organisation;
 - iii) The arrangements for practical measures or procedures to achieve safe working practices or manage safety issues.
- 1.2. This document covers i) and ii) above. The arrangements for practical measures and procedures are detailed in separate policy documents for each working practice or safety issue.
- 1.3. The Health and Safety Policy applies to all employees of the Information Commissioner's Office (ICO), as well as any agency staff, secondees, contractors and visitors to ICO premises.
- 1.4. The policy applies to all ICO workplaces. This includes the Headquarters buildings in Wilmslow, capital city offices in Belfast,

Cardiff, Edinburgh and London. Our policy will also extend to cover the new Manchester office when it becomes operational. Where possible, common procedures will apply in all ICO office locations, though in shared buildings local procedures may need to be applied.

- 1.5. The Health and Safety policy applies to staff who are working from home or working remotely from the office.
- 1.6. The ICO employs over 1,100 people. Our headquarters are in Wilmslow, Cheshire and around 90% of our staff are contracted to this office. Other staff are contracted to our capital city offices.
- 1.7. The majority of our staff spend time working from home which reflects the type of working practices found in many similar organisations. Our health and safety practices therefore need to take account of the traditional office based work and the use of the home as a work base.
- 1.8. The ICO recognises its responsibilities regarding health, safety and welfare at work in accordance with the Health and Safety at Work Act 1974, all other relevant Health and Safety legislation and the Fire Precautions (Workplace) Regulations. This overarching policy and more specific policies and procedures are intended ensure the ICO meets all legislative requirements and surpass them where reasonably practicable to do so.

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2. H&S Policy Part 1: Statement of intent from the Chief Executive Officer

I have statutory responsibilities for the health, safety and wellbeing of all our colleagues at the ICO. It's a part of the responsibilities of being an employer that I, and the Executive Team, take very seriously.

Like many other organisations, the ICO's staff work flexibly both in terms of timing and location. More people are combining spending time working in the office with days when they work from home.

This means that we must recognise, anticipate and respond to the challenges of keeping people safe in a range of different working environments, as well as in our offices. This includes both the physical and mental aspects of health, safety and wellbeing.

We are committed to protecting our employees, agency staff, contractors and any other people who are affected by our activities.

To do this we will comply with the requirements of health and safety legislation and, wherever reasonably practicable, strive to surpass these standards.

The ICO will deliver adequate control of health and safety risks by dedicating the time and resources needed to provide our people with the systems, infrastructure and support to allow them to work safely and safeguard their wellbeing.

By also providing timely information and guidance, we will enable people to take steps to protect themselves and others wherever appropriate.

Everybody connected with the ICO has a personal responsibility to behave in a way that enhances the safety and welfare of themselves and others. Through co-operation and collaboration, everyone can contribute to a culture on positive safety and wellbeing practices.

By continuing to do these things we can enable our people to achieve their very best, in a safe and supportive environment.

Paul Arnold

Chief Executive Officer

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3. Health and Safety Policy Part 2: Role Responsibilities

3.1 The following sections of the document describe the responsibilities of various post holders in relation to health and safety management in the organisation.

4. Responsibilities: The Chief Executive Officer

4.1. The Chief Executive Officer will ensure:

- i. that the ICO has a clear Health and Safety Policy.
- ii. that the relevant organisational arrangements and resources are made available to enable the policy to be implemented and monitored.

5. Responsibilities: Members of the Executive and Senior Leadership Teams

5.1. Members of the Executive and Senior Leadership Teams will ensure:

- i. that Health and Safety issues are incorporated into the planning of operational activity, through liaison with a competent person. This will ensure effective risk management as an integral part of business strategy.
- ii. the effectiveness of the Health and Safety Policy is monitored and reported upon in relevant Corporate Boards.

6. Responsibilities: Head of Facilities and Estates

6.1. The Head of Facilities and Estates, supported by the Health and Safety Manager, will:

- i. Chair the Health, Safety and Wellbeing Committee.
- ii. Line manage the Health and Safety Manager, the Facilities Manager and their teams – ensuring that they deliver the functions required of their roles and provide direction and support as required.
- iii. Be responsible for budgets and resources dedicated to health and safety matters.
- iv. Report relevant matters to the Director of Finance, as Directorate lead, and ensure that relevant corporate boards are kept informed of pertinent health and safety issues.
- v. Keep trade union appointed health and safety representatives informed of relevant issues relating to health and safety.

7. Responsibilities: The Health and Safety Manager

7.1 The Health and Safety Manager will:

- i. Establish and maintain a Health and Safety policy and related procedures and ensure they are available to all staff.
- ii. Ensure policies and procedures are reviewed at appropriate intervals, engaging with representatives as necessary.
- iii. Liaise with the Organisational Development and Capability team to ensure that staff are adequately trained to perform their jobs in a safe manner.
- iv. Ensure adequate numbers of staff with appropriate safety training are available within the ICO.
- v. Investigate work based accidents and incidents and, where necessary, inform the appropriate enforcing authority.
- vi. Ensure that adequate risk assessments have been conducted into work activities and that they are reviewed periodically.
- vii. Monitor the organisation's compliance with relevant health and safety legislation and regulations.
- viii. Co-ordinate Health and Safety matters relating to the ICO's capital city offices, engaging with relevant local managers and staff.

8. Responsibilities: The Facilities Manager

8.1 The Facilities Manager will:

- i. Ensure that all contractors are appropriately qualified for the work they will undertake and that health and safety matters are considered when contracts are being tendered.
- ii. Ensure that contractors provide the ICO with method statements for work undertaken that is likely to pose significant risk to ICO employees or the contractors themselves.
- iii. Conduct office health and safety inspections at all ICO sites and record findings.
- iv. Monitor health and safety matters within the premises under their management on a daily basis, and take corrective action in a timely manner when issues arise which may impact on the health, safety and welfare of staff.
- v. Co-ordinate the conduct of work station audits by the Facilities Team, escalating for specialist advice where appropriate, and arrange for the purchase of necessary equipment.
- vi. Co-ordinate Facilities matters relating to the ICO's capital city offices, engaging with relevant local managers and staff.

9. Responsibilities: People Managers

9.1 People Managers will:

- i. Ensure that tasks allocated to colleagues are safe, and that due regard is taken to safeguard the health, safety of wellbeing of the people they manage.
- ii. Take appropriate action to address the health, safety and wellbeing issues of team members or their working arrangements and activities.
- iii. Lead and promote safe practices with the team, and engage with specialist managers or services for support where necessary.

10. Responsibilities: Staff

10.1 Staff (including employees, agency workers; contractors; secondees, trainees and work experience students) will:

- i. Conform to ICO Health and Safety policies and procedures and actively participate in maintaining a safe working environment in the office and whilst working at home.
- ii. Familiarise themselves with any ICO guidelines/material regarding safe working practices.
- iii. Report all accidents or incidents that have led or may lead to injury.
- iv. Alert their line manager to any potential hazards or risks they have identified in their working environment.
- v. Wear personal protective equipment and use safety devices provided for the safe performance of specified tasks.
- vi. Ensure that members of the public visiting our premises do not act in a manner likely to cause risk to themselves or others.
- vii. Not do anything that places themselves or others in danger.
- viii. Not misuse any equipment provided for health and safety purposes.

11. Responsibilities: Safety Representatives

11.1 Safety Representatives will:

- i. Communicate policy on health and safety matters within their work area.
- ii. Attend Health, Safety and Wellbeing Committee meetings.
- iii. Support the development of relevant policies and procedures.

- iv. Inform management of any unsafe practices or arrangements of which they become aware.

Feedback on this document

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Version history

Version	Changes made	Date	Made by
5.0	New policy statement from Deputy CEO Changes to responsibilities to reflect new ICO roles Update to format of document	May 2023	Mike Collins
5.1	Addition of H&S and Facilities responsibilities for Regional Offices	July 2023	Mike Collins
6.0	Scheduled policy review and update of Statement of Intent	September 2025	Mike Collins

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