



# HEALTH & SAFETY POLICY

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Key Changes	New must statement for Health & Safety Coordinators Inclusion of volunteering in non-standard events Minor wording changes throughout Policy ownership change
Version	7.0
Effective date	1 <sup>st</sup> December 2025
Last Reviewed	12 <sup>th</sup> November 2025

## TARGET AUDIENCE

- NFU Mutual Group employees and temporary workers.
- NFU Mutual Salaried Agents.

# Health & Safety Policy

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## 1.0 Introduction

This Policy sets out our general approach to managing health and safety and outlines the responsibilities for ensuring compliance with health and safety legislation and controlling health and safety risks throughout our organisation. Please see the appendix for a full list of Health and Safety legislation that is relevant to our organisation.

## 2.0 Policy Scope & Application

This Policy applies to the following individuals:

- All Group employees
- Contractors, Consultants, and Temporary Employment Agency staff <sup>1</sup>
- Salaried Agents

The Policy must be complied with at all times.

### 2.1 Risk Appetite

***We aim to take a pragmatic approach to ensure operational risks are managed to as low a level as possible, balancing the cost and practicality of further mitigation against the benefits and impacts to NFU Mutual, our members and other stakeholders of accepting the risks.***

Supporting this qualitative statement, the quantitative operational risk appetite statements shown in the table below provide a quantifiable representation of the amount of risk our organisation is willing to accept at any given time to achieve our business goals while maintaining financial viability and strong reputation and brand and attracting and retaining high calibre employees. This policy sets the expectations for the business to manage operational risks within the highlighted risk appetite statements.

	<b>Risk Appetites - Quantitative statement</b>
<b>Financial Impact</b>	Single operational risk events or single root causes that result in an unplanned financial impact of £500,000 or more over any 12-month period.
	Unplanned changes totalling >£50m to balance sheets items arising from a single operational risk event or root cause
<b>Legal and Regulatory Impact</b>	Sanctions requiring changes to business practices as a result of inappropriately responding to regulations or legislation relevant to the Group.
<b>Reputational Impact</b>	Sustained, adverse national press coverage over a two-week period.
<b>Customer Impact</b>	Detriment to 10% or more of the customers for the product or to 1000 customers.
<b>People Impact</b>	Any actions or decisions that risk causing significant injury, significant ill health or death to employees, visitors to our premises, or those working on behalf of the Group.
	Group-wide voluntary staff attrition rate greater than 150% of the relevant benchmark figure, as measured over a rolling 12-month period and the Gallup Engagement score for the Group is below top quartile at the same time.

<sup>1</sup> Individuals undertaking work or providing services on a short term or temporary basis. This does not include 3<sup>rd</sup> party suppliers considered to be a company / corporate entity that supplies services (the Business Relationship Manager has responsibilities to ensure 3<sup>rd</sup> party suppliers comply with all relevant Group Policies).

## 2.2 Policy Requirements & Evidence

What does the policy require me to do and how do I evidence that the policy is being applied:

Ref	Who	Action The actions that 'must' or 'must not' be carried out	Action Rationale An explanation of how the action manages the risk	Action Evidence
1	All Group employees MUST	<p>Read the Employee Health and Safety Information Handbook and follow the rules stated within here which include requirements to: -</p> <ul style="list-style-type: none"> <li>-Co-operate with NFU Mutual management in all matters relating to Health and Safety.</li> <li>-Take reasonable care for the Health and Safety of themselves and anyone else who may be affected by their acts or omissions at work.</li> <li>- Not interfere with or misuse equipment provided for managing health and safety requirements.</li> <li>-Escalate Health and Safety issues or concerns within a timely manner to their People Manager.</li> <li>-Report any health and safety incidents, injuries, or illnesses, or near misses caused during work related activities as soon as possible via the accident reporting procedure on Mutualnet.</li> <li>-Report any medical conditions /medication that may affect the safe operation of equipment used in performing work related activities to their People Manager.</li> </ul>	To ensure that Health and Safety risks do not arise because of actions taken or not taken by employees.	<p>Records are retained that employees have read the Employee Health and Safety Handbook which sets out the Health and Safety rules and responsibilities.</p> <p>Documented quarterly Health and Safety inspections and annual audits allow checks to be made that the rules are being followed.</p> <p>Accidents and incidents including near misses that are reported are monitored within Group Health and Safety.</p>
1	All Group employees MUST	Wear Personal Protective Equipment (PPE) that has been provided.	The required PPE must be worn to provide appropriate protection against identified health and safety hazards.	<p>Risk assessments are completed which determine PPE requirements.</p> <p>Records are kept by departments of the PPE issued.</p> <p>Health and Safety annual audits are completed which allow checks to be made that the correct equipment is</p>

Ref	Who	Action The actions that 'must' or 'must not' be carried out	Action Rationale An explanation of how the action manages the risk	Action Evidence
				being issued and records kept.
1	All Group employees MUST	Read the safe working procedures relevant to their workplace activities and implement the stated control measures.	The safe working procedures specify steps that must be followed by employees for the control of the risk from identified hazards.	Records are retained by the departmental Health and Safety Co-ordinators that the relevant safe working procedures have been read.  Health and Safety annual audits allow checks to be made by Group Health and Safety that the correct procedures are being read by employees.
1	All Group employees MUST	Not introduce the use of any work equipment, including any mains powered electrical equipment, heating or cooking appliances into the business without prior authorisation from their People Manager.	Equipment used within our work activities must be suitable for the task to be undertaken and be subject to regular inspection and portable appliance testing where appropriate.	Documented quarterly Health and Safety inspections completed for all our occupied buildings.  Ladder inspection logs.
1	All Group employees MUST	Submit a non-standard event form and appropriate Health and Safety documentation for any team building, fund-raising, volunteering or other non-standard events they are arranging (e.g. not a normal work-related activity). Arrange for the event to be authorised by departmental managers.	To ensure the risks associated with team building, fund-raising, volunteering and other non-standard events are managed within our risk appetites.	Completed non-standard event forms and supplementary documentation, including risk assessments submitted for review and approval by Group Health Safety records of all non-standard events and documentation maintained.

Ref	Who	Action  The actions that 'must' or 'must not' be carried out	Action Rationale  An explanation of how the action manages the risk	Action Evidence
2	People Managers MUST	Provide Group employees, Contractors, Consultants, temporary Employment Agency staff and Salaried Agents with the right equipment to perform their duties in a safe manner. This includes ensuring reasonable adjustments are made to control any specific risks.	Suitable equipment is required so that duties can be performed in a safe manner and specific hazards encountered controlled.	Health and Safety annual audits completed with reports issued.  Xactium risk management system for recording risk information.  Documented quarterly Health and Safety workplace inspections of our occupied buildings completed.
2	People Managers MUST	Have oversight and arrangements for the management of health and safety for Group employees, Contractors, consultants, temporary Employment Agency staff and Salaried Agents and their workplaces under their control. This includes the identification, assessment, control, recording and escalation of risks arising from workplace activity that could cause harm or injury to those people, or anyone affected by the undertakings of the business.	To ensure the risks associated with work-related activities are managed within our risk appetites.	Health and Safety annual audits completed with reports issued.  Documented quarterly Health and Safety workplace inspections of our occupied buildings completed.
2	People Managers MUST	Identify the requirements for the provision of information, instruction, training and supervision for group employees, contractors, consultants, temporary employment agency staff and salaried agents. Arrange for this to be carried out where required.	To ensure Group employees, Contractors, consultants, temporary Employment Agency staff and Salaried Agents are competent to manage health and safety risks proportionate to their role and place of work.	Completed induction checklists.  Department meeting minutes.  Health & Safety posters displayed or communicated electronically.  Training records retained by the department Health and Safety Coordinators.  Health and Safety annual Audits completed that

Ref	Who	Action The actions that 'must' or 'must not' be carried out	Action Rationale An explanation of how the action manages the risk	Action Evidence
				includes a review of the training requirements. Xactium risk management system for recording risk information.
2	People Managers MUST	Consult with direct reports in matters relating to Health and Safety and monitor their safety performance.	To embed health and safety within the culture of the business.	Team meeting minutes. e-mail trails. MA performance reviews. Health and Safety annual Audit results.
2	People Managers MUST	Not authorise the introduction of any work equipment, including mains powered electrical equipment, heating or cooking appliances for use in our work activities or within our occupied buildings without prior authorisation from Group Properties and/or Group Health and Safety, if it will compromise any of the health and safety arrangements.	Equipment used within our work activities must be assessed in terms of suitability for the task and be subject to regular inspection and portable appliance testing where appropriate.	Documented quarterly Health and Safety workplace inspections completed of our occupied buildings.  Ladder inspection logs.  Risk assessments completed by Group Health and Safety.
3	The Group Health and Safety Manager MUST	Have in place a written Health & Safety Management system, that includes arrangements for managing Health and Safety throughout NFU Mutual.	Our Health and Safety Management system includes arrangements for managing Health and Safety risks for our work activities and work areas.  This includes risk assessments that identify the controls required to allow work to be completed in a safe manner.	Health and Safety arrangements published on mutualnet which includes our Health and Safety standards, safe working procedures, guidance and template documents.  Documented risk assessments completed for our work

Ref	Who	Action The actions that 'must' or 'must not' be carried out	Action Rationale An explanation of how the action manages the risk	Action Evidence
				activities and areas.
3	The Group Health & Safety Manager MUST	Provide appropriate communications and instruction/training materials for employees, contractors, consultants, temporary employment agency staff, salaried agents, visitors, and contractors.	To ensure Group employees, Contractors, consultants and temporary Employment Agency staff, Salaried Agents and visitors are provided with a proportionate level of Health & Safety and risk awareness information and training. This will allow them to carry out their role in accordance with our Health and Safety arrangements.	Health and Safety annual audits, risk assessments and fire risk assessments identify further training needs. Health and Safety e-learning developed and reviewed annually. Face to face training sessions developed and delivered. Quarterly Health and Safety posters communicated Training records retained by the department Health and Safety Coordinators. Contractors Health and Safety information sheets retained.
3	The Group Health & Safety Manager MUST	Arrange for fire risk assessments and periodic reviews to be undertaken for Group occupied offices.	To ensure the risks from fire are managed within our risk appetites.	Documented fire risk assessments held, including improvement action plans.
3	The Group Health & Safety Manager MUST	Arrange for risk assessments to be completed for work areas and activities that present a risk to Health and Safety.	To ensure suitable and sufficient control measures are in place to prevent injury or ill health.	Documented risk assessments held. Annual Health and Safety Audit reports completed which include a review of risk assessments required and completed.

Ref	Who	Action The actions that 'must' or 'must not' be carried out	Action Rationale An explanation of how the action manages the risk	Action Evidence
				Records of departmental specific risk assessments, including display Screen Equipment assessments retained by departmental Health and Safety Coordinators.
4	Group Properties MUST	Have in place arrangements for the maintenance of buildings and equipment so that they are kept in good order and repair.  Maintain all work equipment that is provided by Group Properties so that it is in good working condition and subject to inspection and statutory examination where required.	To ensure buildings, plant and equipment do not present a risk of injury or ill health.	Property Inspections.  Planned preventative Maintenance records.  Department KRI's/KCIs.  Statutory examinations and certificates.  Building audits completed by Group Health and Safety  Quarterly workplace inspections
4	Group Properties MUST	Appoint suitable contractors for all proposed work, ensuring that they are competent and that they supply appropriate details of their Health and Safety arrangements.	To ensure the safety of contractors whilst on our premises and those who may be affected by their work.	Records retained of all due diligence documentation including risk assessments and method statements (RAMs).  Works completed under contract  Tender documents

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				Visitor management records
4	Group Properties MUST	Ensure service and maintenance contracts are in line with the stated risk appetite for all other operational risks as approved by Group Operational Risk Committee (GORC)	To ensure all group properties suppliers and third-party relationships are managed in line with the Groups operational risk appetites.	Due Diligence reporting. Evidence of compliance with the Supplier outsourcing and third-party policy or exceptions Supplier management reporting. Supplier management reporting. Xactium risk management system for recording risk information. GORC / Divisional Risk and Issues Committee (DRIC) minutes.
5	Health and Safety Coordinators MUST	Implement Health and Safety arrangements as outlined within NFU Mutual's Health and Safety Management system, which includes maintaining relevant Health and Safety information for employees, temporary staff and contractors within the department they look after,	To ensure our control measures are implemented through the completion of all required training, assessments and other checks.	Health and Safety Coordinator Responsibilities guide on Mutualnet which details the procedures to be followed. Health and Safety record spreadsheet maintained by Health and Safety Coordinators.

### 2.3 Policy Escalation

If you cannot comply with the requirements of this policy, you must report this to the Policy owner.

If you cannot achieve compliance with Group Risk Appetites, you **must** seek approval from your People Manager. Cases **must** be recorded on the Operational Risk Recording tool(s). Dependant on the overall net risk assessment the risk must be escalated to the relevant risk authority in line with the requirements of the Operational Risk Handbook.

Property-related H&S issues **must** be reported to Properties. The Operational Risk Recording tool(s) should reflect the situation.

People-related H&S issues **must** be reported to the Group Health & Safety Manager. The Operational Risk Recording tool(s) should reflect the situation.

### 2.4 Further Information

Groups Health and Safety & Properties intranet pages

**3.0 Appendix – legislation list**

Health and Safety at Work etc. Act 1974 (England, Scotland, and Wales)  
 Health and Safety at Work (Northern Ireland) Order 1978  
 The Health and Safety at Work Order 1998 (Isle of Man) \*  
 Corporate Manslaughter and Corporate Homicide Act 2007  
 Employers' Liability (Compulsory Insurance) Act 1969  
 Equality Act 2010  
 Health Act 2006  
 Public Health (Wales) Act 2017  
 The Smoking, Health, and Social Care (Scotland) Act 2005  
 The Smoking (Northern Ireland) Order 2006  
 The Regulatory Reform (Fire Safety) Order 2005  
 Fire Safety (Scotland) Act 2005  
 The Fire and Rescue Services (Northern Ireland) Order 2006

Construction (Design and Management) Regulations 2015  
 Construction (Design and Management) Regulations (NI) 2016  
 Control of Asbestos Regulations 2012  
 The Control of Asbestos Regulations (NI) 2012  
 Control of Noise at Work Regulations 2005  
 The Control of Noise at Work Regulations (NI) 2006  
 Control of Substances Hazardous to Health Regulations 2002  
 Control of Substances Hazardous to Health (NI) Regulations 2002  
 Control of Vibration at Work Regulations 2005  
 Control of Vibration at Work Regulations (NI) 2005  
 Dangerous Substances and Explosive Atmospheres Regulations 2002  
 Dangerous Substances and Explosive Atmospheres Regulations (NI) 2003  
 Electricity at Work Regulations 1989  
 Electricity at Work Regulations (NI) 1991  
 Employers' Liability (Compulsory Insurance) regulations 1998  
 Employers' Liability (Compulsory Insurance) regulations (NI) 1999  
 Fire Safety (Employees' Capabilities) (England) Regulations 2010  
 Fire Safety (Employees' Capabilities) (Wales) Regulations 2012  
 Fire Safety (Scotland) Regulations 2006  
 The Fire Safety Regulations (Northern Ireland) 2010  
 Furniture and Furnishings (Fire Safety) Regulations 1998 as amended  
 Gas Safety (Installation and Use) Regulations 1998  
 Gas Safety (Installation and Use) Regulations (NI) 2004  
 The Health and Safety (Consultation with Employees) Regulations 1996  
 Health and Safety (Consultation with Employees) Regulations (NI) 1996  
 Health and Safety (Display Screen Equipment) Regulations 1992  
 Health and Safety (Display Screen Equipment) Regulations (NI) 1992  
 Health and Safety (First Aid) Regulations 1981  
 The Health and Safety (First Aid) Regulations (Northern Ireland) 1982  
 Health and Safety Information for Employees Regulations 1989  
 Health and Safety Information for Employees Regulations (NI) 1991  
 Health and Safety (Signs and Signals) Regulations 1996  
 Health and Safety (Signs and Signals) Regulations (NI) 1996  
 Health and Safety (Young Persons) Regulations 1997  
 Health and Safety (Young Persons) Regulations (NI) 1997  
 Ionising Radiations Regulations 2017  
 Ionising Radiations Regulations (NI) 2017  
 Lifting Operations and Lifting Equipment Regulations 1998  
 Lifting Operations and Lifting Equipment Regulations (NI) 1999  
 Management of Health and Safety at Work Regulations 1999  
 Management of Health and Safety at Work Regulations (NI) 2000  
 Manual Handling Regulations 1992  
 Manual Handling Regulations (NI) 1992  
 Personal Protective Equipment at Work Regulations 1992  
 Personal Protective Equipment at Work Regulations (NI) 1993

Pressure Systems Safety Regulations 2000  
Pressure Systems Safety Regulations (NI) 2000  
Provision and Use of Work Equipment Regulations 1998  
Provision and Use of Work Equipment Regulations (NI) 1999  
Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013  
Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (NI) 1997  
Safety Representatives and Safety Committees Regulations 1977  
Safety Representatives and Safety Committees Regulations (NI) 1979  
Smoke-free (Exemptions and Vehicles) Regulations 2007  
Smoke-free (Premises and Enforcement) Regulations 2006  
Smoke-free (Signs) Regulations 2012  
Smoke-free Premises and Vehicles (Wales) Regulations 2020  
The smoke-free premises etc. (Wales) regulations 2007  
Prohibition of Smoking in Certain Premises (Scotland) Regulations 2006  
The Smoke-free (Private Vehicles) Regulations (Northern Ireland) 2021  
The Smoke-free (Signs) Regulations (Northern Ireland) 2007  
The smoke-free (premises, Vehicle Operators and Penalty Notices) Regulations (Northern Ireland) 2007  
Work at Height Regulations 2005  
Work at Height Regulations (NI) 2005  
Workplace (Health, Safety and Welfare) Regulations 1992  
Workplace (Health, Safety and Welfare) Regulations (NI) 1993  
Working Time Regulations 1998 as amended  
Working Time Regulations (NI) 2016

\* This is the primary piece of legislation covering occupational health and safety on the Isle of Man. The islands health and safety legislation are broadly based on that of the United Kingdom's; however it does have its own suite of health and safety legislation.