

Health and Safety Policy

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1. Introduction

NHS East Lancashire Clinical Commissioning Group (CCG) attaches great importance to Health and Safety, and recognises its legal obligations under the Health and Safety at Work etc. Act 1974, to ensure the health, safety and welfare of its staff, and those that use its services or activities, so far as is reasonably practicable.

Work can make a positive or negative contribution to individual health. Organisations that successfully manage health and safety recognise the relationship between the control of risks and the core business objectives plus the important contribution which employees and their representatives can make to improve health and safety.

The CCG in adopting a positive pro-active stance on health and safety aims to promote an accountable culture which is just and fair to its employees. It also enables the CCG to learn from incident reports and risk assessments in order to continuously improve its health and safety management and, where necessary, change policy/procedure to enable this to happen.

This policy will set out the CCG arrangements for health and safety and follow the recognised standard of HSG65 for all health and safety related policies, this safety model includes Plan, Do, Check and Act.

2. Scope

This policy applies to all employees of the CCG including bank, locum, agency, and sub-contracted staff. Managers at all levels are expected to take an active lead to ensure that health and safety and systems of internal controls are of the highest standard and integral to the operation of the organisation.

The CCG will ensure that adequate resources are provided to meet legal health and safety standards and provide sufficient information, instruction and training to enable employees, independent contractors, bank, agency and locum staff to carry out their work safely.

3. The CCG's Health and Safety Management System

The Health and Safety Management System (HSMS) forms part of the CCG overall management system. It provides structured arrangements to reduce health and safety risks associated with the CCG activities, thereby meeting the requirements of the Health and Safety at Work etc. Act 1974 and associated legislation.

The HSMS has been design primarily to be appropriate to the scope and scale of risk associated with our activities. The frame work of documents comprises:

- Our Health and Safety Policy which confirms the CCG's Governing Bodies commitment in relation to Health and Safety;
- Organisational responsibilities which state the group and individual responsibilities for delivering the Policy commitment;
- A suite of Health and Safety Policies / Procedures that specify the standards and requirements that must be implemented in order that the commitment in the Health and Safety policy is met.

The main elements of our HSMS are:

- Strong and effective leadership at every level of the organisation;
- A detailed understanding of the risks facing our business and those arising from our activities;

- Implementation of proportionate control measures to eliminate risks so far as is reasonably practicable;
- Checking and measurement of the effectiveness of risk controls;
- Learning from our and others' experiences, as well as new research, so that we improve our understanding of risk;

4. Objectives

4.1. CCG's Health and Safety objectives are to:

- Comply with all relevant Health and Safety legislation, Approved Codes of Practices (ACOP), Guidance Notes, Secretary of States Directives and other relevant standards;
- Integrate Health and Safety principles into service delivery, management and decision making processes;
- Consult and Communicate with employees and trade union representatives to ensure they are all aware of their health and safety responsibilities;
- Strive for continuous improvement in health and safety standards;
- Recognise the different demands that the CCG's faces and work to deliver a consistent approach to managing health and safety.

4.2. To achieve these objectives the CCG's will:

- Develop and maintain a documented and consistently applied health and safety management system including clear roles, responsibilities and clear reporting lines;
- So far as is reasonably practicable, provide and maintain healthy and safe work places, equipment and methods of working;
- Provide sufficient resources to meet our commitment to health and safety;
- Appoint competent persons to support us in meeting our statutory duties;
- Provide employees at all levels with suitable and sufficient information, instruction, training and supervision to enable them to work safely and avoid any actions that may adversely affect the health and safety of themselves or others;
- Work with partners, stakeholders, external contractors and other agencies to develop awareness, a common understanding and promote good standards of health and safety;
- Undertake continuous monitoring of our health and safety performance.

5. Roles and Responsibilities

5.1. Structure for Health and Safety Management

In order to ensure that health and safety is successfully managed within the CCG, clear lines of responsibility and accountability to ensure a positive health and safety culture is fostered by the visible and active leadership of senior management.

5.2. The CCG's Governing Body

The CCG Governing Body is responsible for the organisation's system for internal control, including health and safety management. The Accountable Officer is designated with overall responsibility for ensuring the implementation of external assurances covering health and safety and reporting to the Governing Body. This function forms part of the role of the Accountable Officer, who delegates some of these responsibilities to members of the Senior Management team. The Governing Body ensures that Health and Safety Performance Indicators are set and monitored by the Quality and Safety Committee.

5.3. The Accountable Officer

The Accountable Officer has overall accountability and responsibility for all matters involving health, safety, welfare and fire appertaining to the CCG; it is also the responsibility of all Managers to manage health and safety issues within their functional area. The Accountable Officer also has responsibility for:

- Ensuring that adequate resources are available to implement the Health and Safety Policy;
- Ensuring that health and safety performance is regularly reviewed at Governing Body Level;
- Monitoring the effectiveness of the Health and Safety Policy;
- Ensuring that this policy is reviewed at least annually.

5.4. The Director of Corporate Business

The Director of Corporate has been nominated as the member of the Governing Body responsible for the overall co-ordination and monitoring of the implementation of this policy in the CCG. Particular responsibilities include ensuring:

- Reviewing the implementation of the Health and Safety Policy;
- Demonstrating commitment to the promotion of Health and Safety within the CCG;
- Ensure sufficient resources are allocated to implement the Health and Safety Policy and procedures;
- Ensuring that mandatory training for all employees is provided and that adequate resources are available to meet those training needs.

5.5. Executive and Senior Team

Executives and senior managers will support the Accountable Officer and carry direct responsibility for the implementation of Health and Safety related policies within their areas of control. They will do all that is reasonably practicable to establish and maintain high standards of health, safety and welfare in their areas of control.

5.6. All Managers

All managers are responsible for ensuring that health and safety is an integral part of the management process within their area of responsibility.

All managers have the responsibility to:

- Ensure that the CCG's Health & Safety Policy, Procedures and Safe System of Works are communicated and implemented to all employees;
- Ensure all employees have induction and instruction emphasising health, safety, and welfare aspects of all operations;
- Promote a positive and proactive approach to Health and Safety;
- Ensure risk assessments are undertaken for work activities they control, in consultation with their employees. This includes identifying the hazards, those at risk and how they could be harmed.
- Develop, implement and review safe working practices to satisfy themselves that appropriate and sufficient control measures are in place to remove or reduce the risks to as low as is reasonably practicable;
- Ensure that they and their employees have adequate levels of training, instruction and supervision to work safely with minimal risk to themselves or others;

- Ensure that emergency and evacuation procedures, especially means of escape in the event of fire, are known to all staff, contractors, volunteers, visitors and customers and that escape routes are kept free from obstruction;
- Ensure employees report all accidents and incidents and that methods to prevent a recurrence are implemented through investigation;

5.7. Employee Duties and Responsibilities

All Employees employed and contracted by the CCG have a statutory duty to take reasonable care of their own safety and the safety of others who may be affected by their acts or omissions.

Employees must comply with all relevant legislation, CCG's policies and procedures, attend mandatory and statutory training, and report untoward incidents or unsafe occurrences.

Employees have a responsibility for bringing to the immediate attention of their Manager any failings that could be detrimental to themselves and others, including visitors.

6. General Arrangements for Health and Safety

6.1. Health and Safety Policies / Procedures

The overall corporate Health and Safety Policy is supported by a number of other operational policies/procedures that provide more detailed guidance on certain aspects of health and safety. These documents do not supersede this policy, but should be read in conjunction with it.

Further policies/procedures and guidance will be produced as required by changes in legislation or in line with best practice.

All health and safety policies/procedures will be reviewed by the CSU's Health and Safety Team who will, where appropriate, ensure that any management approval is obtained, prior to publication.

6.2. Risk Assessments

The Management of Health and Safety at Work Regulations 1999 make more explicit the general duties placed on the CCG's under the Health and Safety at Work etc. Act 1974. In order to meet with the regulatory requirements, the CCG's will ensure:

- Risk assessments are carried out in order to evaluate and adequately control hazards, so to ensure the health, safety and welfare of employees, and others who may be affected by work activities of the CCG's;
- Risk assessments are recorded in writing, on the appropriate form, in accordance with the CCG's Risk Management Policy;
- Arrangements will be made for putting into practice the preventative and protective measures that follow from the risk assessment;
- Risk assessments will be regularly monitored and reviewed to ensure they remain 'live' documents. They will be updated in accordance with legislative requirements, Standards, Codes of Practice etc.;
- The outcomes of risk assessments will be readily available and communicated to staff. Staff will receive instructions and/or training associated with the level of risk identified and the control measures taken to prevent or control risks;

6.3. Accident and Incident Reporting

In the event of an accident/incident staff will ensure that a detailed entry of the event is recorded on an accident form and will notify their line manager who will subsequently determine, in conjunction with the CSU's Health and Safety Team, if notification is required under The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) 2013.

Where an accident/incident has occurred, it is necessary to carry out a review of the risk assessment of the task being undertaken at the time, to ascertain if additional precautions, an alteration of the method of work or additional control measures are necessary. This must be written down and the conclusions clearly defined and acted upon.

As a learning organisation we will use the information to prevent re-occurrences, where reasonably practicable, to the same events.

7. Health and Safety Representatives & Consultation

Managers should strive to have in place arrangements to consult with staff on matters of health and safety. Where Health & Safety representatives are in place, whether they are Trade Union or non-Trade Union appointments, full co-operation should be given to the requirements of their role in the workplace.

The duties of Health and Safety representatives are, to a degree, job and work area specific with a common theme of ensuring the environment is as safe as is reasonably possible and protecting their colleagues from harm.

Any member of staff may make representation to Safety Representatives or Staff Representatives on any matter relating to their Health, Safety or Welfare.

8. Training

Health and Safety training is a statutory requirement of legislation and therefore mandatory for all staff of the CCG's. Provision will be made to ensure staff receive adequate information, instruction and training with respect to Health and Safety where appropriate.

All new permanent employees must receive an Induction to include Health, Safety, Welfare, Fire and Security procedures and arrangements.

9. Dissemination and Implementation

For health and safety management to be effective within the organisation, this strategy has to become a living document and a natural "part of everyday working practice".

A structured and supportive approach for the implementation of this strategy will demonstrate the CCG's commitment that all staff are taking positive steps and working in partnership with each other and stakeholders to provide a positive health and safety culture within the organisation.

To achieve this, the Health and Safety Policy will be;

- Approved by the CCG's Quality and Safety Committee and reviewed annually;
- Circulated to all Managers, with specific responsibilities detailed in the document;
- Available electronically on the CCG shared drive and via the CCG website;
- Available to all stakeholders on request (in an appropriate format);

It is a legal requirement that a Health and Safety poster (Health and Safety Law “What you need to know” HSE (2008)) is displayed in every workplace area that employees have access to that outlines British Health and Safety law.

10. Measuring Performance

Health and Safety performance will be measured by the CSU’s Health and Safety Team and reported back to the CCG by:

- Monitoring corporate performance standards;
- Regular auditing and undertaking inspections;
- Accident/incident reporting and investigation;
- Liaising with Human Resources and Occupational Health to check the effectiveness of health surveillance and detecting early signs of risks to health.

11. Equality Analysis Assessment

The CCG aims to design and implement procedural documents that meet the diverse needs of our service and workforce, ensuring that no one is placed at a disadvantage over others, in accordance with the Equality Act 2010.

The Equality Analysis Checklist initial screening, which was used to determine the potential impact this policy might have with respect to the individual protected characteristics, is incorporated at Appendix B.

The results from this initial screening indicate that this policy will not require a full Equality Analysis Assessment.

12. References

The Health and Safety at Work etc. Act 1974;
The Management of Health and Safety at Work Regulations 1999;
The Workplace (Health, Safety & Welfare) Regulations 1992;
The Reporting of Incidents, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR).
Health and Safety (First Aid) Regulations 1981 (as amended);
The Health and Safety Information for Employees Regulations 1989;
The Safety Representatives and Safety Committees Regulations 1977 (as amended);
The Health and Safety (Consultation with Employees) Regulations 1996 (as amended);
Disability Discrimination Act 1995;

Appendix A

GENERAL STATEMENT OF HEALTH AND SAFETY POLICY

Philosophy

NHS East Lancashire Clinical Commissioning Group (CCG) is committed to providing a safe and healthy working environment for all its employees and regards health and safety as a matter of the utmost importance. An effective policy enhances business performance, reduces injuries and ill health, protects the environment and reduces unnecessary losses and liability. It follows that minimising risk to employees, visitors, and property is inseparable from all other business objectives.

General Statement of Policy

The CCG, as an employer, is committed to ensuring the health, safety and welfare of its employees, so far as is reasonably practicable. We also fully accept our responsibility for other persons who may be affected by our activities and we will take steps to ensure that our statutory duties are met at all times. The Governing Body expects all staff, visitors, contractors and other employers who work at the CCG to share this commitment by complying with the CCG policies and procedures, and to understand that they too have legal and moral obligations to themselves and to one another.

We intend to ensure the health and safety of all persons who may be affected by our activities are maintained by ensuring that, in so far as is reasonably practicable:

- A safe working environment is provided, along with adequate welfare arrangements and facilities;
- Identifying hazards and conducting formal risk assessments when appropriate in order to minimise the risk for all activities undertaken by the CCG;
- All systems of work are safe and without unnecessary risks to health and safety;
- Providing, managing and maintaining plant and equipment so that it is, so far as reasonably practicable, safe and that risks to health are controlled;
- Ensuring that control measures and emergency procedures are: in place; effective ; properly used; monitored and maintained;
- Provide suitable and sufficient information, instruction, training and supervision at all levels necessary to ensure that staff are competent to undertake their work activities;
- Consulting with and involving our staff in matters relating to their own health and safety;
- Keeping up to date with best practice in relation to health and safety and complying with all relevant legislation and authoritative guidance.
- Contractors & Providers undertaking work on behalf of the CCG, are competent to do so;

The CCG will undertake to continually review and develop our safety management systems, with the overarching aim of conducting our activities in a manner which does not affect the health and safety of any staff, contractors, visitors or members of the public.

I and the other members of the Governing Body are committed to this Policy and to the implementation and maintenance of the highest standards of health, safety and welfare within the CCG. We expect every member of the CCG to share this commitment and to work together to achieve it.

Signature of Accountable Officer

Printed Name:

Date:

Appendix B

Equality Analysis Checklist

Equality Analysis Checklist	Yes	NO
<p>Does the 'Activity' being considered for equality analysis affect service users, employees or the wider community and therefore potentially be highly significant in terms of equality?</p> <p><i>(Relevance will depend not only on the number of those affected but also by the significance of the effect on them)</i></p>		X
<p>Is it a major 'Activity' with significant implications for equality?</p> <p><i>E.g. a strategy, commissioning large scale programmes, care pathway re-design, building development etc.</i></p>		X
<p>Has previous engagement highlighted important inequalities for protected groups?</p>		X
<p>Does or could the 'Activity' affect different protected groups differently?</p>		X
<p>Does the 'Activity' relate to a known area of inequalities?</p> <p><i>E.g. access issues for disabled people, services for vulnerable people.</i></p>		X
<p>If you have answered yes to any of the questions above you need to complete an Equality Analysis.</p> <p>Focus attention on those aspects most relevant to equality. Which protected groups is it most relevant to?</p>		
<p>If you answered no to all of the questions above then you don't need to undertake an Equality Analysis.</p> <p><i>*When you decide an 'Activity' is not relevant to equality and therefore does not require an Equality Analysis it is important to document the decision and reason for the decision. This ensures that you have not overlooked potential issues relevant to equality which could leave you vulnerable to legal challenge.</i></p>		
<p>Decision: No requirement for a full Equality Analysis Assessment</p>	<p>Reason: The degree of relevance to individual equality strands will <u>not</u> require a full Equality Analysis Assessment.</p>	
<p>Name: Mark Jump (SLCSU Health and Safety Manager)</p>	<p>Date: 01 March 18</p>	