HEALTH & SAFETY POLICY

Version 2.0

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Name of Policy:	Health & Safety
Date Issued:	July 2017
Date to be reviewed:	14th June 2019, or before if required.

Policy Title:	Health & Safety	
Supersedes: (Please List)	Health & Safety Policy V1.0	
Description of Amendment(s):	Policy reviewed, logo updated, no other changes.	
This policy will impact on:	All staff and visitors	
Policy Area:	HR & Corporate Policies	
Version No:	2.0	
Author:	Helen Johnson, Health & Safety Advisor	
Effective Date:	July 2017	
Review Date:	14th June 2019, or before if required.	
Equality Impact Assessment Date:	16th August 2017	
APPROVAL RECORD	Integrated Audit and Governance Committee	04 July 2017
Consultation:		

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1. INTRODUCTION

This policy is intended to reflect the views of Hull Clinical Commissioning Group (the CCG) and sets out the Health & Safety Policy Statement, as well as details of the organisation and arrangements that have been implemented, in order for the CCG to comply with the Health & Safety at Work etc Act 1974. The policy is supported by a number of documents that offer guidance about specific health & safety issues.

2. PURPOSE / POLICY STATEMENT

The CCG aims to provide all staff, visitors and service users with a safe environment, in which to be able to work or visit, without suffering any personal injury or ill health. It recognises the need to identify significant health & safety related hazards and implement any necessary measures, in order to eliminate or reduce any associated risks of harm, damage or loss.

The CCG aims to prevent, or reduce the nature and severity of all workplace accidents, the spread of infectious diseases and any dangerous occurrences in line with the Reporting of injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) 1995.

All employees are expected to co-operate with this policy and ensure they comply with any statutory duties under Health & Safety Legislation. Management and staff will work proactively together to ensure that all plans, procedures and systems of work are designed to take full account of health & safety issues. This will include arrangements for a safe place of work, maintenance of equipment, safe handling of substances and articles, the assessment of any risks, and sufficient information, instruction and training for staff to ensure they comply with their individual statutory duties.

The CCG Chief Officer accepts overall responsibility for health & safety in the CCG. However, day to day responsibility for health, safety and welfare is delegated to Directors. They have responsibility for the well-being of all staff, service users and visitors within their respective work areas. In line with Management of Health & Safety at Work Regulations 1999, the CCG also employs a competent person to assist in complying with its statutory health & safety duties.

Hull CCG Chief Officer

Signed: Dated: 15th June 2017

3.   SCOPE

This policy applies to all Hull CCG employees, Contractors, Locum, Agency Staff and Students.

4.   ROLES AND RESPONSIBILITIES / ACCOUNTABILITY

The Hull CCG Chief Officer fully accepts their responsibility for health & safety in the workplace and will discharge this through their organisational responsibilities.

4.1   Hull CCG Chief Officer

The overall and final responsibility for health & safety in the CCG rests with the Chief Officer.

The CCG Chief Officer is responsible for:

- The provision of sufficient resources to implement the Health & Safety Policy
- Ensuring that all employees are fully aware of their statutory responsibilities and that these responsibilities are fulfilled
- Ensuring that the CCG complies with all statutory health & safety requirements
- Ensuring reports on accident statistics, trends and remedial measures indicated are submitted to the Health & Safety Group.
- The Chief Officer accepts overall responsibility for health & safety in the CCG. However, day to day responsibility for health, safety and welfare is delegated to Directors.

4.2   Directors

- The implementation of the Health & Safety Policy, corporately and within their areas of control
- Effective delegation of safety responsibilities within their areas of responsibility
- Effective support for their senior managers' decisions and recommendations in terms of the provision of appropriate resources for health & safety
- The promotion of a positive health & safety culture which enables all employees to fulfil their statutory duties
- That staff have adequate experience and training to safely undertake their work

- The development and implementation of any emergency procedures that may be relevant to their areas of responsibility.

4.3   Senior Managers

All senior managers, in addition to their duties as employees, must:

- Ensure regular inspections of the workplace and equipment are undertaken and that steps are taken to eliminate or minimise any hazards identified, undertake risk assessments as required and, where there is a significant risk to health & safety, communicate the results of those assessments to employees before they are exposed to such risks

- Ensure the robustness of any health & safety documents used within their teams

- Ensure that all staff are provided with such training and adequate supervision as is considered appropriate for them to perform their work safely

- Develop safe systems of work to reduce the risks of personal injury and/or damage to plant or equipment and monitor the performance of these systems

- Investigate and report on all accidents and incidents, and take appropriate measures to prevent recurrence

- Ensure that the provision of first aid in the workplace is commensurate with the level of risk associated with work activities

- Refer staff with work related health problems to the Occupational Health Provider.

- Ensure that management and staff work proactively together to ensure that all plans, procedures and systems of work are designed to take full account of health & safety issues. This will include arrangements for a safe place of work, maintenance of equipment, safe handling of substances and articles, the assessment of any risks, and sufficient information, instruction and training for staff to ensure they comply with their individual statutory duties

- Ensure that risk assessments, which identify significant risks to health & safety are undertaken and the results of those assessments are communicated to employees before they are exposed to such risks

- Ensure that arrangements are made for consultation with Union accredited Health & Safety Representatives and all employees in the workplace

- Ensure adherence of contractors to the prescribed health & safety standards

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4.4 Employees

All employees must:

- Take reasonable care of their own health & safety and that of others who may be affected by their acts or omissions
- Undertake their tasks as instructed, in line with any risk assessment findings and training
- Report to their manager any health & safety concerns, including the activities of outside contractors
- Not misuse or interfere with any equipment provided to ensure safe working practice in the workplace
- Report any accident, involving injury, damage to plant and equipment, or potential injury, damage or loss
- Co-operate with, and assist, other colleagues and management in implementing the Health & Safety Policy
- Co-operate with this policy to ensure they comply with any statutory duties under Health & Safety Legislation

4.5 Fire Safety Advisor

The Fire Safety Advisor will ensure processes, policies and procedures are in place to comply with statutory requirements such as the Regulatory Reform (Fire Safety) Order 2005. They will:

- Ensure that regular reports are presented to the Health & Safety Group informing them of the current state of fire safety in premises for which the CCG is responsible
- Ensure that fire related incidents are reported and investigated and actions are taken to mitigate any risks and address any issues identified from this process
- Receive reports following Fire Risk Assessments and ensure that action is taken to mitigate risks and address the issues identified
- Review and revise, where appropriate, all policies and procedures relating to fire safety

Specialist advice will be procured from an appropriately qualified Fire Safety Advisor who will be responsible for providing advice on all aspects of fire safety including fire prevention, control and evacuation.

4.6 Occupational Health Provider

The CCG has procured an Occupational Health Service. The Occupational Health Provider delivers a full professional occupational health service, which includes staff support and guidance, counselling, health surveillance and pre-employment screening.

4.7 Infection Control Nurse

The CCG has procured Infection Control Services. The Infection Control Nurse will be responsible for providing advice and guidance on all infection control issues. They are responsible for providing staff with suitable training and for ensuring that adequate monitoring is provided to detect any infection control risks or problems.

5 Consultation and Communication with Stakeholders

5.1 Health & Safety Group

In line with the Health & Safety at Work Act 1974, the CCG has a Health & Safety Group that is directly accountable to the Integrated Audit and Governance Committee. The aim of the group is:

- To promote partnership working between management and staff in initiating, developing and implementing improvements to ensure effective employee health & safety

- To work towards the creation of a workplace environment that secures the health, safety and welfare of all persons working for and on behalf of the CCG and to recognise the impact on health, safety and welfare of any organisation engaged by or working with the CCG

- To promote the use of and contribute to safe working practices and systems of work and to promote and contribute to the safety of all persons entering onto the CCG's premises for whatever reason

- To provide strategic direction on health & safety matters

- To analyse incident statistics and risk reports in conjunction with their causational factors and action plans to ensure the CCG has effective arrangements for assuring health & safety management

- To ensure that management of Health & Safety plans are complementary to the overall Risk Management Strategy

- To work toward the establishment of a positive health, safety and welfare culture, throughout the Hull CCG, that contributes to all aspects of service provision, by actively encouraging good practice in both individual and group behaviour

- To contribute to and support planning and execution of work activities, promoting reasonable co-operation between all employees.
- To monitor the effectiveness of the Health & Safety Policy and its revision where necessary
- To conduct an annual audit of the safety provisions within the CCG and the implementation of any recommendations arising from such an audit.

The Group provides the CCG with a forum at which managers and staff can consult about any health & safety issues, in good time, before the introduction or change of legislation, new equipment or new technology. It allows staff representatives to communicate with managers, in order to raise health & safety issues that may be of concern and cannot be resolved at a local level.

Staff side members are accredited Trade Union Safety Representatives of recognised Trade Unions and as such are entitled to carry out their role and functions as detailed in the Safety Representatives & Safety Committee Regulations 1977.

6. EQUALITY AND DIVERSITY

All policies require an assessment for their impact on people with protected characteristics. An Equality Impact Assessment has been undertaken for this policy and as a result of performing the analysis, it is evident that no risk of discrimination exists. This screening can be found in Appendix 1.

In applying this policy, the CCG will have due regard for the need to eliminate unlawful discrimination, promote equality of opportunity, and provide for good relations between people of diverse groups, in particular on the grounds of the following characteristics protected by the Equality Act (2010); age, disability, gender, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, and sexual orientation, in addition to offending background, trade union membership, or any other personal characteristic.

7 NHS CONSTITUTION

7.1 The CCG is committed to:

- the achievement of the principles, values, rights, pledges and responsibilities detailed in the NHS Constitution, and
- ensuring they are taken account of in the production of its Policies, Procedures and Guidelines

7.2 This Policy and Procedure supports the NHS Constitution and the NHS Pledge to provide support and opportunities for staff to maintain their health, well-being and safety.

8. RISK ASSESSMENTS

In line with The Management of Health & Safety Regulations 1999 and The Workplace (Health, Safety & Welfare) Regulations 1992, the CCG is required to assess the workplace for hazards and outline the control measures in place to ensure the risks of injury are removed or kept as low as possible. A range of Risk Assessment forms have been developed for the organisation and can be found on the Intranet.

Completed risk assessments can be found on the CCG's Y:/ drive, and in the Health & Safety Folder at each premises.

9. ARRANGEMENTS

The CCG has a number of supporting policies that offer staff further information about relevant health & safety issues. It is essential that all staff familiarise themselves with any health & safety policy documents that are applicable to their work activities. Some examples include:

- Fire Policy
- Security Policy
- Lone Worker Policy
- Violence & Aggression Policy

9.1 First Aid at Work

In line with the First Aid at Work Regulations 1981, the CCG will ensure, through the risk assessment process that adequate first aid provisions are made to deal with any injuries sustained by staff whilst at work. Where it is assessed as being necessary, competent first aiders at work will be appropriately trained and supported to carry out their roles. Names and locations of specific first aiders will be prominently displayed in the workplace. The qualified first aider will be responsible for replenishing the stocks and maintaining the contents of the first aid box.

External trainers will carry out first aid training. The syllabus of any course will need to meet the Health & Safety Executive's criteria and be suitable for 'First Aid at Work'. The course will qualify individuals as 'Certified First Aiders at Work'. Individuals will need to attend a refresher course in accordance with legislative requirements in order to remain competent.

9.2 Accident and Incident Reporting

The CCG aims to prevent, or reduce the number of accidents and incidents to a minimum. It will monitor all accidents and incidents and implement the necessary control measures to prevent any recurrence.

The CCG uses a reporting system (DATIX) for all accidents and incidents. These will be investigated initially by the local manager/supervisor in accordance with the Incident Reporting Policy. The Health & Safety Advisor may undertake further investigations or provide support depending on the circumstances of the incident. Where required, incidents will be reported to appropriate external stakeholders in accordance with the Incident Reporting Policy. All original documents that record accidents and incidents will be maintained in line with the Incident Reporting Policy.

10. IMPLEMENTATION & DISSEMINATION

The CCG Chief Officer will ensure through the CCG's line management arrangements, that health & safety considerations are included in any future business planning. Directors will ensure appropriate cascading of health & safety objectives throughout their area of responsibility in order to ensure that the needs of the organisation are identified, prioritised and that appropriate resources are allocated.

Policy documents are available via the Hull CCG intranet and the Y:drive.

11. TRAINING

The CCG will ensure, via its recruitment process and subsequent training programme (both internal and external), that, during their period of employment, all members of staff have the appropriate level of competence to be able to safely carry out their role. Every senior manager must ensure that new members of staff joining their teams complete all required statutory and mandatory health & safety related training within the first 3 months of commencement of employment.

Mandatory training for all staff on minimising risk includes information on health & safety and risk assessment processes. Various health & safety e-learning packages are also available. These packages include; COSHH, Fire Safety and Manual Handling.

Local managers/supervisors must ensure that all staff are competently trained in the safe use of any equipment they may be tasked to use during the course of their employment. This will include any update training and any further training necessary as a result of any changes in the workplace arising from the introduction of new procedures and/or new equipment and in accordance with identified Training Needs Analyses. Health & Safety training records for all staff will be held by the organisation.

12. MONITORING COMPLIANCE WITH AND EFFECTIVENESS OF THIS POLICY

12.1 Proactive Monitoring

The CCG Chief Officer and Directors will ensure that health & safety is monitored via audits and inspections. This will support the overall health & safety planning and assist in promoting a positive health & safety culture. The involvement of Trace Union health & safety representatives in this process will be encouraged.

12.2 Reactive Monitoring

Monitoring of injuries, ill health and other 'loss events' will take place as necessary, to complement active monitoring. This monitoring process will involve both managers and safety representatives. The investigation of such accidents/losses, together with analysis of incidents, will be used as a tool to identify causation, reduce future incidents and assess the effectiveness of the policy arrangements. The CCG Chief Officer and Directors will ensure that such re-active monitoring is undertaken on an organisation wide basis.

12.3 Audit and Review

Health & Safety incidents will be reported in the first instance on the DATIX Incident Reporting system, in accordance with the CCG's policy for reporting and managing incidents. A quarterly consolidated Incident Report will be presented to the Health & Safety Group.

Risk Assessments will be reviewed annually and will be monitored by the Health & Safety Advisor, Where appropriate, identified risks may be inserted into the Corporate Risk Register.

Audits will be conducted in accordance with the Annual Audit Plan and results will form the content of the Annual Audit Report.

In addition, the following are used to monitor the contents and outcomes of this policy:

- Serious Untoward Incidents (SUI's)
- Health & Safety Audits
- Health & Safety Group Action Notes
- Risk Registers
- Incident Reports
- Complaints
- RIDDOR

13. RELATED DOCUMENTS/POLICIES

- Risk Management Strategy
- Incident Reporting Policy
- Fire Policy
- Security Policy
- Lone Worker Policy

14. REFERENCES

- Health & Safety at Work etc Act 1974
- Management of Health & Safety at Work Regulations 1999
- Workplace (Health, Safety & Welfare Regulations 1992
- Control of Substances Hazardous to Health (CoSHH) Regulations 2002
- Provision and Use of Work Equipment Regulations 1999
- First Aid at Work Regulations 1981
- Display Screen Equipment (DSE) Regulations 1992
- Regulatory Reform (Fire Safety) Order 2005
- Safety Representatives & Safety Committee Regulations 1997
- Reporting of Injuries, Diseases & Dangerous Occurrences Regulations (RIDDOR) 1995
- National Health Service Litigation Authority Risk Management Standards
- Health & Safety Executive (HSE) Website
- Health & Safety Group Terms of Reference
- HSG Guidance – HSG 65 – Successful Management of Health & Safety at Work
- Equality Act (2010)
- Human Rights Act (1998)
- Equality Duty (Public Sector) (2011)

15. REVIEW

This Policy will be reviewed on every 2 years or if necessary, revised in light of legislative or organisational changes or as a result of any significant incident.

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HR / Corporate Policy Equality Impact Analysis:	
Policy / Project / Function:	Health & Safety Policy V2.0
Date of Analysis:	16th August 2017
Completed by: (**Name and Department**)	Helen Johnson, Health & Safety Advisor
What are the aims and intended effects of this policy, project or function?	This policy aims to ensure that Hull CCG takes all necessary steps to provide a safe environment for all staff and visitors and provide safe working methods for all staff.
Are there any significant changes to previous policy likely to have an impact on staff / other stakeholder groups?	No changes to previous version
Please list any other policies that are related to or referred to as part of this analysis	Hull CCG COSHH policy Hull CCG Manual Handling Policy Hull CCG Driving for Work Policy Hull CCG DSE Policy Hull CCG Fire Policy Hull CCG PAT Testing Policy Hull CCG First Aid Policy
Who will the policy, project or function affect?	This policy will affect all staff whilst on duty and all visitors to Hull CCG Premises
What engagement / consultation has been done, or is planned for this policy and the equality impact assessment?	This policy has been agreed by the local staff side representative Toni Yel
Promoting Inclusivity and Hull CCG's Equality Objectives. How does the project, service or function contribute towards our aims of eliminating discrimination and promoting equality and	This policy aims to promote inclusivity for all in matters relating to Health & Safety, including those identified by their protected characteristics.

diversity within our organisation?

How does the policy promote our equality objectives:
1. Ensure patients and public have improved access to information and minimise communications barriers
2. To ensure and provide evidence that equality is consciously considered in all commissioning activities and ownership of this is part of everyone's day-to-day job
3. Recruit and maintain a well-supported, skilled workforce, which is representative of the population we serve
4. Ensure the that NHS Hull Clinical Commissioning Group is welcoming and inclusive to people from all backgrounds and with a range of access needs

Equality Data

Is any Equality Data available relating to the use or implementation of this policy, project or function?

Equality data is internal or external information that may indicate how the activity being analysed can affect different groups of people who share the nine *Protected Characteristics* – referred to hereafter as *'Equality Groups'.*

Examples of *Equality Data* include: (this list is not definitive)

1: Recruitment data, e.g. applications compared to the population profile, application success rates

2: Complaints by groups who share / represent protected characteristics

4: Grievances or decisions upheld and dismissed by protected characteristic

Yes

| X |

No

| |

Where you have answered yes, please incorporate this data when performing the *Equality Impact Assessment Test* (the next section of this document).   If you answered No, what information will you use to assess impact?

Please note that due to the small number of staff employed by the CCG, data with returns small enough to identity individuals cannot be published. However, the data should still be analysed as part of the EIA process, and where it is possible to identify trends or issues, these should be recorded in the EIA.

group
5: Insight gained through engagement

Assessing Impact

Is this policy (or the implementation of this policy) likely to have a particular impact on any of the protected characteristic groups?
(Based on analysis of the data / insights gathered through engagement, or your knowledge of the substance of this policy)

Protected Characteristic:	No Impact:	Positive Impact:	Negative Impact:	Evidence of impact and, if applicable, justification where a *Genuine Determining Reason*[1] exists (see footnote below – seek further advice in this case)
Gender	X			This policy applies to all regardless of gender
Age	X			This policy applies to all regardless of age
Race / ethnicity / nationality	X			This policy applies to all staff regardless of race/ethnicity. Analysis of employee data indicates that the percentage of white employees is reflective of the local population. However, the proportion of BME staff is lower than that of the local population it serves. All staff require competencies which include the ability to read and understand English or to request the information in

1.   [1] *The action is proportionate to the legitimate aims of the organisation (please seek further advice)*

				another format available to them
Disability	X			This policy applies to all regardless of disability
Religion or Belief	X			This policy applies to all regardless of religion or belief
Sexual Orientation	X			This policy applies to all, regardless of sexual orientation
Pregnancy and Maternity	X			This policy applies to all regardless of pregnancy or maternity
Transgender / Gender reassignment	X			This policy applies to all regardless of transgender/gender reassignment
Marriage or civil partnership	X			This policy applies to all regardless of marriage or civil partnership

Action Planning:

As a result of performing this analysis, what actions are proposed to remove or reduce any risks of adverse impact or strengthen the promotion of equality?

Identified Risk:	Recommended Actions:	Responsible Lead:	Completion Date:	Review Date:
As the policy is written in English there is a potential impact on employees whose first language is not English and therefore may struggle reading the policy.	The CCGs internal 'portal' and external website signpost individuals to alternative formats such as large print, braille or another language.	CCG Communications	Updating of this facility is ongoing	Next Policy Review - August 2018

Sign-off
All policy EIAs must be signed off by Mike Napier, Associate Director of Corporate Affairs
I agree with this assessment / action plan
Signed:
Date: 5 October 2017