

Health and Safety Policy

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Version No.:	Version 1.0
Approval Date:	May 2021
Review Date:	May 2023

Document Control Sheet

Title:	Health and Safety Policy		
Electronic File Name:	STW CCG Health and Safety Policy		
CCG document ref:	HS001		
Placement in Organisational Structure:	Corporate Affairs		
Consultation with stakeholders:			
Equality Impact Assessment:			
Approval Level:	Audit Committee		
Dissemination Date:	May 2021	Implementation Date:	May 2021
Method of Dissemination:	CCG website/Staff newsletter/CCG Membership/CSU/ shared drive		

Document Amendment History

Version No.	Date	Brief Description
Version 1.0	May 2021	

The formally approved version of this document is that held on the NHS Shropshire, Telford and Wrekin CCG website: www.shropshiretelfordandwrekinccg.nhs.uk

Printed copies or those saved electronically must be checked to ensure they match the current online version.

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1 Introduction

NHS Shropshire, Telford and Wrekin Clinical Commissioning Group (STW CCG) attaches great importance to the health and safety, welfare and security of its entire staff, and recognises its legal obligations under the Health and Safety at Work Act 1974 and other relevant legislation, to ensure the health, safety and welfare of its staff, so far as is reasonably practicable. STW CCG also accepts such responsibility for other persons who may be affected by its activities whilst on any of its sites or conducting activities on its behalf.

Work can make a positive or negative contribution to an individual's 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.

STW 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 and 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's 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 Purpose/Scope

This policy applies to all employees of STW CCG including agency, contracted, 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.

STW 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 and agency staff to carry out their work safely.

STW CCG's Health and Safety objectives are to:

- Comply with all relevant Health and Safety Legislation, Approved Codes of Practices (ACOP), Guidance Notes 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 faces and work to deliver a consistent approach to managing health and safety.

To achieve these objectives the CCG 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 workplaces, 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.

3 Responsibilities

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.

3.1 The Accountable Officer

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

The Accountable Officer in turn, nominates the Director of Corporate Affairs as the nominated Officer with delegated authority to ensure the implementation of the Health and Safety Policy.

A signed statement of intent can be found at Appendix 1 and all staff are required to read and understand this policy.

Executive Directors and Deputy Directors

Executive Directors and Deputy Directors 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.

3.2 Specialist Staff

The Director of Corporate Affairs will act as the 'competent person' as defined in the Management of Health and Safety at Work Regulations 1999, in all matters of health and safety that directly affects STW CCG and its employees.

Has the responsibilities to:

- Identify and assess health and safety risk arising from the CCG's organisational, commercial and service delivery policies, strategies, its operations and supply chains.
- Identify health and safety risks arising from corporate policy and strategy.
- Ensure that health and safety risks arising from the CCG's activities are assessed and reviewed.
- Prioritise health and safety risks according to how they affect the CCG.
- Make sure a range of options to control identified health and safety risks are considered and decision criteria are suitable.
- Specify health and safety controls and maintain the HSMS.
- Promote best practices in the application of the CCG's Health and Safety Policy, Procedures and Health & Safety projects and support the development of relevant knowledge and skills.
- Monitor and evaluate health and safety performance to ensure it is consistent with STW CCG's Health & Safety Policy, Procedures and Health & Safety projects and that the organisation learns from experience.

Health and Safety (Fire) and Security Officer (MLCSU)

The MLCSU Health Safety (Fire) & Security Officer will support as a 'competent person' as defined in the Management of Health and Safety at Work Regulations 1999, in all matters of health and safety that directly affects STW CCG and its employees.

The Health and Safety Officer will;

- Provide professional advice and information to the CCG on health and safety responsibilities, legislation, and good practice.
- Review all new health and safety legislation and guidance and advise senior management on their responsibilities, the impact of any changes and additional measures that need to be taken.
- Advise the Leadership Team and managers on the health and safety implications of any unsatisfactory working conditions for CCG employees.
- Assist in the continuous development of a proactive approach to all health and safety matters that affect the CCG and its undertakings.
- Advise and assist the Managing Director, Directors, Function Leads, Managers and Staff to establish Corporate Health and Safety policies/procedures/guidance and priorities.
- Develop and actively maintain a close working relationship with CCG management and employees on all matters pertaining to health and safety at work.
- Assist with any required Health and Safety related training.
- Promote and advise on the process of systematic hazard identification and risk assessment throughout the CCG and advise managers on the undertaking of risk assessments in relation to their work activities.
- Notify the Health & Safety Executive as required by Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR).

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- Assist managers in the investigation of serious incidents, accidents and monitor and report information on incident trends;
 - Develop and implement suitable health and safety monitoring systems, including auditing and sample inspections, to monitor health and safety standards and compliance with CCG health and safety policies.
 - Liaise with the appropriate enforcing authorities (such as the HSE, Fire Authority, CQC etc.) on all matters concerning the health and safety of CCG employees and CCG premises.
 - In conjunction with Managers monitor the health and safety standards of contractors working on behalf of the CCG.

3.3 Line Managers

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

All managers have the responsibility to:

- Ensure that the CCG's Health & Safety Policy, and its requirements are understood and met by all employees.
- Ensure all employees have induction and instruction emphasising health, safety, security 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 any identified 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 obstructions.
- Ensure employees report all accidents and incidents and that methods to prevent a recurrence are implemented through investigation.

3.4 All Staff

All staff employed and contracted by STW CCG have the following responsibilities:

- To read and understand the CCG's Health and Safety Policy, Procedures and Guidance documents that are relevant to their activities and perform their work in accordance with the requirement of these.
- Comply with all relevant legislation, CCG policies and procedures, complete mandatory and statutory training, and report untoward incidents or unsafe occurrences.
- Work in a safe manner at all times, follow procedures that are in place and take reasonable care of their own safety and the safety of others who may be affected by their acts or omissions.

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- Know all the emergency procedures which may apply to the premises and familiarise themselves with fire alarm activation systems and escape routes;

All staff also have a responsibility for bringing to the immediate attention of their manager any failings that could be detrimental to themselves and others, including visitors/service users.

3.5 The Governing Body

Overall and final responsibility for health and safety performance, and legal compliance lies with the Governing Body who has given delegated authority to the Audit Committee to make decisions on its behalf as set out in the Scheme of Reservation and Delegation. The Audit Committee will receive and review regular reports on progress.

3.6 Committees and Groups

Health and safety performance will be measured by the MLSCU Health & Safety Officer and reported back to the Audit Committee on a quarterly basis by:

- Monitoring corporate performance standards.
- Regular auditing and undertaking inspections.
- Accident/incident reporting and investigation.

4 Procedures / Processes

4.1 Risk Assessments

The Management of Health and Safety at Work Regulations 1999 make more explicit the general duties placed on the CCG under the Health and Safety at Work Act 1974. In order to meet with the regulatory requirements, the CCG 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.
- Risk assessments are recorded in writing, on the appropriate form (available from CCG Staff Intranet)
- 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.

4.2 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 (available from CCG Staff Intranet) and sent to the Corporate Affairs Manager and will also notify their line manager who will subsequently determine, in conjunction with the MLCSU Health & Safety Officer, 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 (where applicable), 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.

4.3 Health and Safety Representatives and 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.

5 Related Documents

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. These documents are all available on the CCG Staff intranet.

A list of supporting policies/procedures are:

- Fire Safety Policy
- Display Screen Equipment Policy
- First Aid Policy
- Health and Wellbeing Management Policy
- Accident & Incident Reporting Procedure
- Lone Working Policy
- Managing Challenging Behaviour Policy
- Office Safety Procedure
- Safe Driving at Work Policy
- Security Policy
- Agile Working Policy

6 Dissemination

For health and safety management to be effective within the organisation, this strategy must 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 STW 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 STW CCG's Audit Committee and reviewed every 2 years unless there is a change in legislation or guidance or through lessons learnt.
- Circulated to all Managers, with specific responsibilities detailed in the document.
- Available electronically on the CCG's shared drive and via the CCG's staff intranet.
- 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.

7 Advice and Training

7.1 Advice

Any employee who has concerns about any aspect of health and safety management within the CCG or the services it provides, should raise the issue, firstly, with their line manager or failing that with the CCG's Health and Safety Support.

Contact details

Mark Jump Health & Safety (Fire) and Security Manager – 07771996217
Sarah Hunter – Health and Safety (Fire) and Security Officer – 07919303749

7.2 Training

Health and Safety training is a statutory requirement of legislation and therefore mandatory for all staff of STW CCG. 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.

8 Review and Compliance Monitoring

8.1 Review

The Audit Committee has responsibility for ensuring that health and safety performance is reviewed and will ensure that regular progress reports are presented to the Governing Body.

8.2 Compliance Monitoring

The Audit Committee has responsibility for monitoring the effectiveness of the Health and Safety Policy and will ensure that regular progress reports are presented to the Governing Body.

9 Fraud Bribery and Corruption

- 9.1** Unfortunately fraud, bribery and corruption, as well as theft, does occur throughout the NHS, and as such all NHS employees have a duty to ensure that public funds are protected. The CCG is committed to reducing the level of fraud, bribery and corruption (economic crime) within the NHS to an absolute minimum and keeping it at that level, freeing up public resources for better patient care.
- 9.2** If an employee, manager or volunteer suspects that there has been a potential act of fraud, bribery or corruption against the CCG or the wider NHS, or has seen any suspicious acts or events, they must report the matter to the CCG's Counter Fraud Team (contact details can be found on the CCG's public website) or report the matter to the NHS Fraud and Corruption Reporting Line on 0800 028 4060. Alternatively reports can be made through the online reporting tool at <https://cfa.nhs.uk/reportfraud>. Further advice on counter fraud issues is available from the Executive Director of Finance, Deputy Executive Director of Finance/Fraud Champion and the CCG's Counter Fraud Team.

CCG Counter Fraud Contact details:

Paul Westwood (Heads CW Audit's Counter Fraud Team and is the CCG's nominated Local Counter Fraud Specialist)

Tel: 07545 502400

Email: paul.westwood@cwaudit.org.uk

Email: pwestwood@nhs.net (secure)

10 Counter Fraud

- 10.1** This policy should be read in conjunction with the CCG's policies covering counter fraud, bribery and corruption which can be found on the CCG's website (www.shropshiretelfordandwrekinccg.nhs.uk) or you can contact a member of the Team who will be able to supply a copy.

11 References

- The Health and Safety at Work 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).
- 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);
- Equality Act 2010;
- HSE Successful Health and Safety Management (HSG 65).

Appendix 1

GENERAL STATEMENT OF HEALTH AND SAFETY POLICY

Philosophy

NHS Shropshire, Telford and Wrekin Clinical Commissioning Group (STW 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 Executive Team 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 Executive Team 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 Managing Director: _____

Printed Name: _____

Date: _____

Appendix 2

CCG Health & Safety Risk Assessment

(See Guidance Document on Staff Portal for assistance in completing this risk assessment)

Location / Site		Date		Completed By	
Activity		RA. Number		Reviewed By	
Persons at Risk		Review Date			

Hazard	Existing Control Measures	Initial Risk* (see matrix box below for explanation of L,C,R)			What further actions need to be done to reduce the risk?	Who needs to do it and by when?	New Risk Rating	Date Completed
		L	C	R				

Incident and Risk Assessment Matrix

L= Likelihood Score (How likely is it that the Hazard will Occur?)

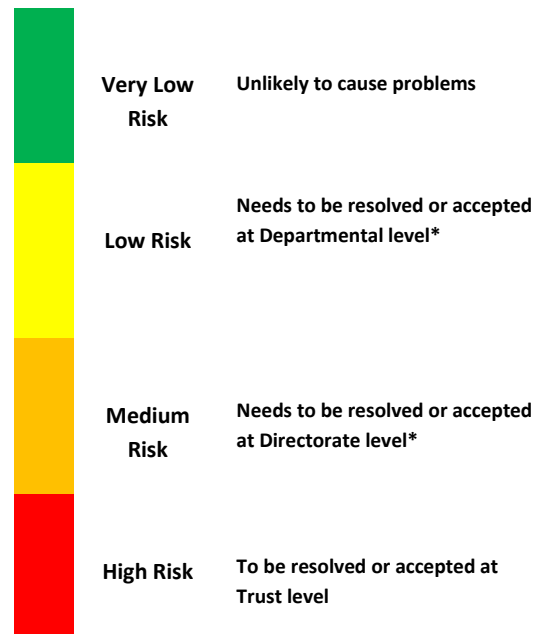
	1	2	3	4	5
Descriptor	Rare	Unlikely	Possible	Likely	Almost Certain
Frequency	Not expected to occur for years	Expected to occur at least annually	Expected to occur at least monthly	Expected to occur at least weekly	Expected to occur at least daily
Probability	<1%	1 – 5%	6 – 20%	21 – 50%	>50%
	Will only occur in exceptional circumstances	Unlikely to occur	Reasonable chance of occurring	Likely to occur	Will almost certainly occur

C= Consequence Score (What would be the consequence if the Hazard did occur?)

Consequence Scoring	1 - Insignificant	2 - Minor	3 – Moderate	4 - Major	5 - Catastrophic
Staff , Visitors	Minimal injury requiring no/minimal intervention. No time off work.	Minor injury or illness; Time off work >3 days;	Injury requiring professional intervention; RIDDOR Reportable Time off work 1 – 4 days.	Major Injury leading to long term disability; Time of work >14 days	Incident leading to death; Permanent injuries or irreversible health effects.

R= Risk Rating Matrix(Multiply L score by C score to get risk rating e.g 2x2=4)

Likelihood	Consequence				
	1 Insignificant	2 Minor	3 Moderate	4 Major	5 Catastrophic
1 – Rare	1	2	3	4	5
2 – Unlikely	2	4	6	8	10
3 – Possible	3	6	9	12	15
4 – Likely	4	8	12	16	20
5 – Almost Certain	5	10	15	20	25



*If the Risk is not acceptable or cannot be resolved at the appropriate level, it needs to be fed to the next level.

Manual Handling Procedure

1 Introduction

Manual handling injuries can occur wherever people are at work, including office and agile environments. Heavy manual labour, awkward postures, equipment handling and previous or existing injury are all risk factors implicated in the development of musculoskeletal disorders.

Statistics show that manual handling of hazardous loads is one of the most common causes of absence due to injury in the workplace. This procedure outlines the measures that must be taken by both managers and employees to reduce the risk of injuries being incurred and sets out guidance for the moving and handling of loads.

2 Definitions

Manual Handling is defined as “any transporting or supporting of a load (including the lifting, putting down, pushing, pulling, carrying or moving) by hand or bodily force”. Regulation 2(1) Manual Handling Operations Regulations 1992 (as amended) 2002.

3 Roles & Responsibilities

Responsibilities of all staff:

Where hazardous handling tasks cannot be avoided a suitable and sufficient risk assessment should be made taking into account:

- The nature of the task
- The nature of the load
- The capabilities of the individuals involved in the task
- The working environment
- Provision, maintenance and suitability of equipment

A risk assessment should be used to implement control measures that eliminate or, where this is not possible, to reduce the risk of injury to the lowest level reasonably practicable.

Accidents and incidents must be reported immediately in compliance with Incident Reporting procedures and treatment/advice sought in the case of injury.

Any employee aware of a health problem or condition, whether or not due to injury which may affect their required manual handling capabilities must report this directly to their manager or refer to the Occupational Health provider if further advice or support is required. Employees who do not carry out safe manual handling techniques, as identified within the LMS training programmes, but carry out unsafe techniques which increases the risk of injury to themselves and others, may be subject to disciplinary action in line with the CCG's Disciplinary Policy.

Managers responsibilities:

Managers must ensure that all manual handling incidents are reported immediately in compliance with the CCG's Incident Reporting System and that appropriate investigations are undertaken.

Managers must ensure that staff carry out their manual handling training via the Learning Management System eLearning tool. If required, further training must be given to staff whose roles require instruction in the use and maintenance of specialised manual handling equipment where provided in the workplace.

Managers are responsible for ensuring that risk assessments are conducted where staff are asked to conduct moving and lifting tasks as part of their job role.

4 Training

Initial mandatory manual handling training will be provided through Learning Management e-learning System.

All new employees must receive training at the first opportunity following appointment if they are unable to provide a record and details of previous training which satisfy the requirements of the CCG. Staff will receive refresher training as necessary. Staff may also be asked to attend further training if new risks are identified or if there are significant changes to the manual handling requirements of their specific role.

All managers must ensure that any staff whose roles require moving or lifting tasks on a daily basis must provide these staff with further face to face manual handling training. A risk assessment will determine the requirement of this training. M&LCSU Health & Safety Department can assist in this training.

5 Monitoring

Manual handling instruction is regarded by the CCG as mandatory training and considers it to be an integral part of the risk management process and all staff must complete on-line training (or attend a course if applicable) when required to do so. Compliance will therefore be monitored through the electronic staff records.

There is further information available from the Health & Safety Executive website

<https://www.hse.gov.uk/msd/manual-handling/index.htm>

or you can contact your Health & Safety Representative