



Health & Safety Policy

Northern, Eastern and Western Clinical Commissioning Group

South Devon and Torbay Clinical Commissioning Group

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Both Commissioning Groups promote equality, diversity and human rights and is committed to ensuring that all people and communities it serves have access to the services we provide. In exercising the duty to address health inequalities, the CCG has made every effort to ensure this policy does not discriminate, directly or indirectly, against patients, employees, contractors or visitors sharing protected characteristics of: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion and belief; sex (gender); sexual orientation or those protected under the Health and Social Care Act 2012 and Human Rights legislation.

All CCG policies can be provided in large print or Braille formats; translations on request; language line interpreter services are available; and website users can use contrast, text sizing and audio tools if required. For any other assistance, please contact either CCG at NEW Devon CCG 01392 205205 or South Devon and Torbay CCG sdtccg@nhs.net or 01803 652500

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1. Introduction

- 1.1 NHS South Devon and Torbay Clinical Commissioning Group and NHS Northern, Eastern and Western Clinical Commissioning Group (to be known as the CCG(s) for the remainder of the policy) are fully committed to protecting the health, safety and welfare of all staff. The Governing Body of each CCG will provide the leadership to ensure that exemplary health and safety practices are firmly embedded throughout the organisation to provide a secure and healthy environment in which to work.
- 1.2 The Governing Bodies have overall responsibility for Health and Safety throughout the organisations' operating activities, specifically:
- Ensuring that all governing body members maintain and demonstrate their commitment to Health and Safety
 - Ensuring that health and safety risks and other information brought to their attention are appropriately considered and acted upon
 - Ensuring adequate resources including finance are made available for the provision of adhering to this health and safety policy and compliance with the Health and Safety at Work, etc. Act 1974.
- 1.3 The CCG will be kept informed and alert to Health and Safety issues and appoints the Head of Governance to co-ordinate matters of Health and Safety management and provide an annual report in accordance with the corporate calendar to each Governing Body. This role does not detract from the responsibilities of the Governing Bodies and other Directors for specific areas of Health and Safety management which are outlined in the constitution and also the Health and Safety at Work, etc. Act 1974.
- 1.4 In compliance with health and safety legislation as it applies, this is a statement of the Health and Safety Policy of the CCG and the arrangements for its implementation. The policy itemises not only the duties of the CCG to protect the health, safety and welfare of its staff, but also the legal obligations that these acts place upon every member of staff whilst at work.
- 1.5 There is an obligation upon the CCG(s) the Head of Governance, the Human Resource team and each line manager to work jointly, and ensure that staff are informed and instructed with regards to Health and Safety training, instruction and that such activities are properly recorded and records maintained.
- 1.6 The CCG(s) are tenants of 6 sites with responsibility for health & safety within own working areas only. Communal areas within buildings are the responsibility of the CCG(s) landlord or their appointed agent.
- South Devon & Torbay CCG is a tenant of:
- **Pomona House**, Oak View Close, Torquay, TQ2 7FF.
- NHS NEW Devon CCG is a tenant of:
- **County Hall**, Topsham Road, Exeter, EX2 4QL
 - **Newcourt House**, Old Rydon Lane, Exeter, EX2 7JU
 - **Bridge House** Collett Way, Newton Abbot TQ12 4PH
 - **Crown Yealm House**, Pathfields Business Park, South Molton, EX36 3LH.
 - **Windsor House**, Tavistock Road, Plymouth, PL6 5UF.
- 1.7 This policy aims to ensure that:
- Managers and individuals of the CCG look after the health, safety and welfare of its staff as far as is reasonably practicable.
 - The health, safety and welfare of other persons e.g. contractors, visitors, general public who are affected by the CCG(s) activities, is looked after.
 - Satisfy the requirements of the relevant regulations as they apply, and any other associated relevant regulations.
 - To supplement and enhance any associated policies

2. Scope of Policy

- 2.1 This policy applies to those members of staff that are directly employed by the CCGs and for whom each CCG has legal responsibility. For those staff covered by a letter of authority/honorary contract or work experience the organisations policies are also applicable whilst undertaking duties for or on behalf of the CCGs. Further, this policy applies to all third parties and others authorised to undertake work on behalf of CCGs.

3. Strategic context

- 3.1 Each CCG attaches great importance to the Health and Safety of its staff, 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, so far as is reasonably practicable. Each CCG also accepts such responsibility for other persons who may be affected by its activities whilst working in the CCG(s) area.
- 3.2 Each CCG aims to design and implement services, policies and measures that are fair and equitable. As part of its development, this policy and its impact on staff, service users and the public have been reviewed in line with CCG(s) Legal Equality Duties. The purpose of the assessment is to improve service delivery by minimising and if possible removing any disproportionate adverse impact on employees, service users and the public on the grounds of race, socially excluded groups, gender, disability, age, sexual orientation or religion/ belief.
- 3.3 The Quality and Equality Impact Assessment has been completed and has identified impact or potential impact as “no impact”.

4. How health and safety will be delivered

- 4.1 Good practices will be adopted to manage Health and Safety, and each CCG will endeavour to secure the co-operation of all staff in matters of Health and Safety and encourage their active participation through consultation.
- 4.2 The CCGs have a Site Safety Coordination Group which meets on a quarterly basis. Its purpose is to:
- Provide a forum for consultation and discussion of health and safety matters including review and input into Health & Safety policies and working arrangements and their impact on CCG Staff.
 - Promote co-operation between the Governing Bodies, Managers and Staff on all matters relating to health, safety & welfare.
 - Make recommendations to the Governing Bodies for safety compliance.
- 4.3 All CCG(s) staff are expected to undertake mandatory Health & Safety training every 3 years via the e-Learning tool on ESR. This is outlined in the CCG(s) Mandatory Training Policy which is available to all staff via the CCG(s) intranet pages.
- 4.4 The CCG(s) will make necessary provisions to ensure all Health and Safety policies and procedures are regularly monitored and reviewed. This will include regular site compliance audits and work place inspections of each site.
- 4.5 The CCG will take all necessary precautions to safeguard its staff from exposure to harm including stress at work, violence, harassment and bullying. The CCG(s) HR department is available for one to one advice and guidance.
- 4.6 The CCG(s) ways of working will be guided by:
- Advice from the Competent Advisor
 - Partner organisations
 - Published organisational values
 - HSE guidance

- 4.7 New employees will be provided with a Health and Safety Induction by their line manager (or the line manager's delegated person) or the Site Safety Co-ordinator. The induction includes a Health and Safety statement which new employees are asked to read and sign. This checklist will be retained in the employee's personal file.

5. The general statement

- 5.1 It is a requirement under Section 2 of the Health and Safety at Work, etc. Act 1974 that the organisation prepares and, as often as may be appropriate, revises a written statement of its general policy with respect to the Health and Safety at work of its staff, outlining the legal and statutory duties for both the employer and staff. This also provides details of the organisation responsibilities for carrying out that policy and to bring that statement or any subsequent revision of it to the attention of all staff.

It is the policy of the CCG(s) to:

- provide and maintain standards of health, safety and welfare, which comply fully with Health and Safety at Work, etc. Act 1974 and any other statutory provisions, or approved codes of practice relevant to the nature of the business
- provide and maintain equipment and systems of work that are suitable, safe and without risk to health
- provide all staff with sufficient instruction, information and supervision to develop and encourage safety awareness in order to work in a safe manner
- provide a safe place of work including safe access and egress.
- establish joint consultation on matters of Health and Safety in order to help identify risks and to assist in the prevention of accidents; and
- ensure that as far as is reasonably practicable, that the operations of the CCG(s) are safe and without risk to the Health and Safety of visitors and the local community.

6. Organisation and responsibilities

- 6.1 The Chief Officer is accountable for the CCG(s) Health and Safety systems.
- 6.2 The Chief Officer has delegated responsibility for all aspects of Health and Safety to the Head of Governance
- 6.3 At an operational level, the duties will fall to the Site Safety Coordinator lead for NEW Devon CCG
- 6.4 The Human resources team and individual line managers are responsible for ensuring staff receive all necessary Health and Safety training, instruction and information and that such activities are properly recorded and records maintained. The line managers together with site safety coordinators will:
- organise the department, section or workplace so that operations or work carried out is to a satisfactory standard of safety, resulting in minimal risk to people, equipment and materials;
 - plan and maintain good house-keeping
 - review operating and work instructions and specific related hazards to staff transferred into the department and/or new staff
 - ensure all accidents / incidents are reported in accordance with the accident and incident reporting procedure so that they may be recorded
 - ensure all staff are aware of Health and Safety procedures
 - encourage the good behaviours required by staff by setting a good example with respect to Health and Safety.
- 6.5 Site Safety Co-ordinators are appointed for each premise. Their role is to co-ordinate and report, safety issues relating to their nominated office, represent the views of Staff at Site Safety Coordinators meetings and the staff forums / staff councils as appropriate. Responsibilities of this role include;

- Consulting with local managers and staff on Health & Safety matters
- Co-ordinating risk assessments, reports and other information as appropriate for feedback to the Corporate Services team/Safety Group as appropriate.
- Ensuring safety inspections and relevant records are maintained for relevant premises.
- Ensuring that the necessary work equipment is adequate, available, properly maintained and used appropriately
- Attending Site Safety Coordinator Group meetings
- Attend as appropriate Staff Forum and / or Staff Council meetings

Details of Site Safety Coordinators can be found in Appendix 1

7. Staff duties and responsibilities

- 7.1 All staff whilst at work have a legal duty to take reasonable care for the Health and Safety of themselves and others who may be affected by their acts or omissions, and to co-operate fully with the arrangements made by the organisation to meet its legal responsibilities for Health and Safety as in Section 7 of the Health and Safety at Work, etc. Act 1974.
- 7.2 Staff have a responsibility for bringing to the immediate attention of their manager, business manager or their Site Safety Co-ordinator, any issues that could be detrimental to themselves and others, including visitors.
- 7.3 It is the responsibilities of all staff to:
- comply with local fire procedures;
 - comply with local first aid procedures;
 - not attempt to repair any item of electrical equipment (unless properly authorised to do so) but to report it to their manager or the Site safety Coordinator
 - not to bring personal electrical equipment into work unless authorisation agreed with site safety coordinator and / or line management
 - report any obstructions to any walkways, entrances and exit areas and avoid creating such obstacles
 - not to use any equipment for which they have not been trained, without first seeking the advice of an appropriately trained person;
 - ensure the cleanliness of workstations taking in to consideration that others may use their desk
 - report any building and/or equipment defects and/or shortfalls in cleanliness to their manager; and
 - set a good personal example with respect to working safely .
- 7.4 Each site has appointed first aid trained staff, details of which are displayed locally at each premise.
- 7.5 Each site has appointed fire wardens, details of which are displayed locally at each premise.
- 7.6 The CCGs take the welfare and mental health of its staff seriously. There are a small group of South Devon & Torbay CCG staff that are Mental Health First Aiders. These staff members are not clinicians or professionals in mental health, however the group have attended a short course on recognising the signs and symptoms of common mental health issues, how to be an effective listener and signpost staff to the right professional help. Self-referral to a Mental Health First Aider detail in appendix 2, this service is currently only available to South Devon & Torbay CCG Staff. NEW Devon CCG staff should contact HR for advice and assistance.

8. Accident Book and RIDDOR reporting

- 8.1 It is CCG policy to report any incidents, accidents and near misses in order for an investigation to be

conducted to eliminate/minimise the possibility of such an event occurring again in the future.

- 8.2 In the event of an accident or incident, the injured party (staff / visitor / contractor), or another person on their behalf must report by email to d-ccg.internal-incidents@nhs.net.
- 8.3 The Site safety coordinator lead and / or a member of the Governance team will follow up, action and investigate where appropriate. Information regarding accidents logged will be forwarded to the injured person(s) for their own records
- 8.4 The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR) is the law that requires employers, and other people in control of work premises to report and keep records of:
- Work related accidents that cause death
 - Work related accidents which cause certain serious injuries
 - Diagnosed cases of certain industrial diseases; and
 - Certain “dangerous occurrences” (incidents with the potential to cause harm).
- 8.5 The Site Safety Coordinator lead and / or the Appointed Competent Person will decide / agree whether an accident is reportable via the criteria as set by RIDDOR.
- 8.6 All reportable events under RIDDOR shall always be thoroughly investigated by the Line manager, and/or Safety Co-ordinator.
- 8.7 All reportable events will be raised and discussed and the Accident and Incident reports (anonymised) will be reviewed by the Site Safety Coordinators Group, Staff Forum and Staff Council as appropriate.

9. Violence/bullying and harassment

- 9.1 The CCG(s) as an employer are under a legal obligation of a duty of care to provide both a safe place and safe system of work. Consequently, this issue is included in the Grievance policy. Any violence, bullying and/or harassment of CCG staff that is reported will be investigated in order to comply with this duty of care.

10. Control of substances hazardous to health (COSHH)

- 10.1 Risk assessments will be undertaken to ensure staff do not become harmed in any way from exposure to hazardous substances in the workplace. Where elimination of that substance is not possible, effort will be made to find a lower risk substitute.
- 10.2 Any potentially hazardous substances identified will be suitably stored and labelled correctly. Appropriate information will be readily available relating to the natural characteristics of a particular substance, and suitable control measures and contingency plans will be in place to ensure appropriate action is taken in the event of an accident or injury.
- 10.3 Full training and information will be given to all staff that are required to handle hazardous substances.

For further guidance on COSHH regulations please refer to the Health and Safety Executive COSHH Regulations <http://www.hse.gov.uk/coshh/>

11. Display screen equipment

- 11.1 All staff who are dependent on the daily and prolonged use of Display Screen Equipment are classed as “display screen users”. The CCG will ensure that risk assessments are carried out to identify any

workstation hazards and risks that a display screen user maybe exposed to. Pregnant staff and new mothers should refer to the SDT CCG risk assessment for new and expectant mothers policy or the Maternity, Maternity support and Adoption Policy for NEW Devon CCG. New starters are asked to complete a self-user DSE assessment. If desk accessories are required upon completion of a DSE Assessment the CCG will purchase the appropriate equipment as is reasonably practical

- 11.2 Staff who have been advised to purchase specialist workstation equipment for a long term condition / disability under the Equality Act 2010 .i.e. specialist chair or height adjustable desk, you will be asked to provide a note or recommendation their medical professional. This is to ensure that the correct equipment is purchased. The CCG is unable to follow up a request for specialist equipment without the relevant clinical recommendation. The recommendation should be discussed and approved by the person's line manager in the first instance. The Site Safety Co-ordinator will require authorisation from the person's line manager to proceed with the order.
- 11.3 Eye and eyesight tests are available free of charge for permanent staff who use DSE as defined above. Please refer to the DSE policy for further details.

For further guidance on working with visual display units please refer to the Health and Safety Executive Regulations 1992 <http://www.hse.gov.uk/msd/dse/guidance.htm>

12. Fire and emergency evacuation

- 12.1 The CCG(s) will ensure a fire risk assessment is conducted (in accordance with the Regulatory Reform (Fire Safety) Order 2005) for each premise occupied, and ensure that appropriate control measures have been implemented and maintained.
- 12.2 Details of Fire Wardens with responsibility for fire prevention/control will be posted on relevant notice boards.
- 12.3 Instruction regarding fire prevention and emergency procedures will be provided for all employees during induction. Details of fire procedures will be located around individual premises, and staff should read the appropriate evacuation procedures for any sites that they attend.
- 12.4 Emergency evacuations prompted by incidents other than fire will have the same essential principles for fire evacuation, although may not be signalled by an audible alarm, but via fire wardens / senior staff who will provide instructions of escape routes as some areas may be impacted by a suspicious device or gas leak for example. Specific instructions will be issued to staff as the need arises.
- 12.5 Personal Emergency Evacuation plan (PEEP's) will be undertaken where required in conjunction with the staff member their line manager and the site safety coordinator and overviewed by the Health & Safety Competent person.

13. Building maintenance

- 13.1 The CCG(s) landlord will have arrangements in place for planned preventative maintenance for all key building services such as air-conditioning, hot and cold water supplies, lighting, cleaning, fire equipment in the communal areas and alarm systems, security systems, sanitary facilities and general decoration.
- 13.2 Agreements will be made with the landlord for such maintenance, and appropriate records will be kept of all maintenance, breakdowns and repairs.
- 13.3 Essential information in the event of emergency breakdowns will be available to the site safety coordinators / landlords or other designated persons at the CCG(s).

14. Manual Handling

- 14.1 All CCG staff are required to undertake mandatory Manual Handling training every 3 years via the e-Learning tool on ESR.
- 14.2 Consideration is given to the elimination of significant manual handling activities wherever practicable with provision of risk assessment for significant risks, and special equipment where appropriate.
- 14.3 Training, supervision and information can be given to staff by competent people prior to work being carried out.

15. Mobile telephones

- 15.1 The use of hand held mobile phone whilst driving is prohibited. It is the advice and strong recommendation of the CCG(s) that mobile phones, even when legally used, should not be used when driving and preference should be given to only using mobile phones when stationary. Please refer to the CCG(s) Mobile phones policy / mobile devices policy.
- 15.2 Consideration must be given to proper rest breaks and staff must not be contacted involuntarily outside normal working hours. Mobile phone users are therefore entitled to switch off their phones during rest breaks, whilst driving and when they are not working.

16. General safety and environmental

- 16.1 The CCG(s) will work with the landlord at each site to ensure that:
- electrical and fire control systems are correctly maintained
 - control measures are in place to ensure communal walkways are free from obstruction at all times.
 - Control measures to deal with ice and snow are in place at all sites
- 16.2 CCG staff must only park their cars in designated areas. The roadways must not be obstructed. Any traffic cones to prevent obstructive parking must not be removed.

17. Premises security

- 17.1 The CCG has security measures in place for each site. These will be actively monitored and reviewed to ensure the safety of staff, visitors and equipment. Any issues or concerns should be reported to the Site Safety Coordinator.

18. Risk assessment

- 18.1 A workplace risk assessment is regularly carried out by a competent person to identify hazards at each site. The assessment states what the hazards are, the risks associated with them, who might be harmed and how. Appropriate control measures will be put in place to reduce risks and regular reviews will be undertaken.

19. Training

- 19.1 Provision will be made ensuring staff receive adequate information, instruction and training with respect to Health and Safety where appropriate. It is a requirement of the CCG that all staff complete the mandatory e-learning Health & Safety module, every 3 years via the e-Learning tool on ESR.

20. Waste disposal including Confidential

- 20.1 Waste will be managed effectively. Thought will be given to waste materials to determine whether they can be reduced, reused or recycled in any way. Where this is not an option, all waste materials will be disposed of safely.
- 20.2 Confidential waste should be shredded by the individual or placed in the confidential waste bins (process differs dependent on site) and will be collected by an appointed secure waste contractor
- 20.3 The CCG(s) will dispose of any food (bi-weekly) kept in the staff fridges that is out of date or could cause contamination with other food. Staff are warned that unless food is retrieved and taken home, the CCG(s) will dispose of it.

21. Working environment

- 21.1 The CCG's will ensure, so far as is reasonably practicable, that the working environment is a safe and healthy one. Provisions will be made in order to comply with the Workplace (Health, Safety and Welfare) Regulations.

22. Third party contractors

- 22.1 Third party contractors are managed by the CCG(s) (for their remit only) together with the Landlord for each respective site; therefore it is the duty of both parties to retrieve and retain all third party contractors' safety documentation for work undertaken under their responsibility. This will include documents confirming appropriate competency (training certificates, qualifications), liability insurance, and where appropriate, copies of risk assessments/method statements.
- 22.2 All contractors that attend CCG sites out of hours will be provided with Health and Safety arrangements and guidance and issued with permits for work where applicable. Responsibility for management of the contractors out of hours will be that of the landlords for work being undertaken on their behalf. Management of contractors for any work undertaken on behalf of the CCG out of hours will be coordinated with the Site safety coordinator and management of the area / directorate requiring the work to be undertaken.

23. Electrical safety

- 23.1 The CCG will liaise with the landlord for each respective site to ensure that all fixed electrical systems are in compliance with the Electricity at Work Regulations, and where a defect is found, will ensure that the fault is rectified, either by repair, or removal/replacement.
- 23.2 Each site has individual provision for the compliance of portable electrical equipment and testing is completed on a regular basis coordinated by the site safety coordinator. All authorised personal electrical equipment must have under gone testing before use.
- 23.3 All staff should report any defects to their Manager with immediate effect. The installation or tampering of any electrical equipment by employees/workers is not permitted.

24. Visitors

- 24.1 All visitors to CCG premises will be required to sign in at each premise. Whilst on the CCG premises, the visitor will become the responsibility of the host they are visiting, and who will remain responsible for the visitor's health, safety and welfare whilst they are on site. The host is to ascertain in a sensitive manner whether the visitor might have any perceived difficulty in responding to an emergency evacuation.

- 24.2 In the event of an emergency alarm, the host is to ensure that the visitor is evacuated from the building in line with the relevant local procedures.

25. Health surveillance

- 25.1 The CCG(s) will endeavour to promote and maintain the highest practicable degree of physical, mental and social wellbeing of its employees. All health aspects of work process and procedures, which may adversely affect the relationship of work on health, will be regularly reviewed.
- 25.2 Health monitoring is conducted, normally at beginning of employment and through line management arrangements. Where an employee advises of a particular impairment, the CCG(s) will conduct a risk assessment to ensure that risks from work activities are minimised.
- 25.3 We provide referral to occupational health services where required.

The CCG(s) policies mentioned in this document can be found:-

South Devon & Torbay CCG – www.southdevonandtorbayccg.nhs.uk

NEW Devon CCG – www.newdevonccg.nhs.uk