



Lewisham

Clinical Commissioning Group

NHS Lewisham CCG Health & Safety Policy

Document Information

Category:	Corporate
Summary:	The purpose of this policy is to outline the Health and Safety strategy in accordance with statutory requirements
Approval Date:	22 May 2015 February 2018
Date of Next Review:	February 2021
Accountable Officer:	Martin Wilkinson
Policy Author:	Peter Medhurst
Version:	Version 1.0
Superseded documents:	Primary Care Trust Health & Safety Policy
Equality Analysis	<p>This policy applies to all permanent and fixed term employees within the CCG. This document has been assessed for equality impact on the protected groups, as set out in the Equality Act 2010. This document demonstrates Lewisham CCG's commitment to create a positive culture of respect for all individuals, including staff, patients, their families and carers as well as community partners.</p> <p>The intention is, as required by the Equality Act 2010, to identify, remove or minimise discriminatory practice in the nine named protected characteristics of age, disability, sex, gender reassignment, pregnancy and maternity, race, sexual orientation, religion or belief, and marriage and civil partnership. It is also intended to use the Human Rights Act 1998 and to promote positive practice and value the diversity of all individuals and communities.</p>
Related Documents:	Fire Safety Policy Incident Reporting Policy Lone Worker Policy Manual Handling Policy

Contents

Section	Title	Page No.
1	Statement of Intent	4
2	Purpose and Scope	5
3	Accountability Arrangement	5
4	Health and Safety Management Arrangements	8
5	Incident Reporting & Investigation	9
6	Health and Safety Training	9
7	Display Screen Equipment	9
8	New and Expectant Mothers	10
9	Young Persons	10
10	Contractors/Temporary Workers	10
11	First Aid	10
12	Security	10
13	Fire Safety	10
14	Control of Substances Hazardous to Health	11
15	Lone Working	11
16	Manual Handling	11
17	Personal Safety	11
18	Working Time Regulations	12
19	Health and Safety Information	12
20	Dissemination & Implementation	12
21	Approval & Ratification	12
22	Review	12
Appendix 1	Health and Safety Structure	14
Appendix 2	Line Managers' specific Health and Safety Responsibilities	15
Appendix 3	Summary of Relevant Legislation	16

1. Statement of Intent

NHS Lewisham Clinical Commissioning Group, known in this document as 'the CCG', recognises in full its responsibilities under the Health and Safety at Work Act 1972 (HASAWA) and attaches great importance to the health, safety and welfare of its employees, visitors and contractors.

Continuity of business can be seriously affected by any significant incident or accident. The CCG strives to have business continuity arrangements in place to ensure that services & activities critical to our local population, Partners, Employees and the Stakeholders are maintained.

The CCG regards the promotion of health, safety and welfare at work as a mutual objective for management and employees at all levels. Health and Safety management is seen as an integral part of that objective. It is, therefore, the CCG's policy to do all that is reasonable and practicable to prevent personal injury and damage to property. This is to protect everyone from foreseeable work hazards, including the public where they come into contact with its premises or services.

1.1 Aims and Objectives

The aims of this Health and Safety Policy are:

- a) To involve and motivate employees in all matters concerning health and safety.
- b) To prevent accidents, injuries and ill health and to identify and eliminate hazardous situations.
- c) To achieve a high standard of occupational health, safety & hygiene.
- d) To control situations likely to be hazardous to health and safety at work and those which may cause damage to persons or equipment.

1.2 Implementation

Within Lewisham CCG the Corporate Director has oversight for Health & Safety arrangements.

It will be the responsibility of line managers to ensure the Health and Safety Policy is available to all staff and implemented fully. Line managers will ensure specific health and safety duties/responsibilities with respect to implementing the policy are clearly outlined in job descriptions.

It will be the responsibility of every employee of the CCG to co-operate with their employer and comply with the Health and Safety Policy.

2. Purpose and Scope

2.1 This policy details how the CCG discharges its duties under the Health and Safety at Work Act 1974 and the Management of Health and Safety at Work Regulations 1999. The responsibilities of the CCG as an employer are to

- Conduct comprehensive workplace risk assessments and to review these risk assessments on a regular basis, at least annually, and immediately after any incident;
- Provide and maintain plant and systems of work which are safe and without risks to health;
- Make arrangements to ensure substances and articles can be used, handled, stored and transported safely;
- Provide information, instruction, training and supervision, to ensure the health, safety and welfare of employees and others;
- Maintain the place of work in a safe condition, without risk to health, so far as is reasonably practicable;
- Ensure safe means of access and egress in all workplaces;
- Provide and maintain a safe and healthy working environment with the provision of adequate welfare facilities.

2.2 The CCG also recognises its responsibilities to protect non-employed persons from being exposed to the risks of its activities, and its responsibility to other users of its premises.

2.3 The CCG aims to ensure that all employees are made aware of and understand their duties to take reasonable care of their own and others' health and safety.

2.4 In addition to the Health and Safety at Work act 1974, the CCG recognises all statutory health and safety requirements that apply to its activities and the need for these to be met at all times.

2.5 The CCG's Health and Safety Policy applies to:

- All staff employed by the CCG, working on its premises;
- All staff employed by the CCG, working in people's homes, their own homes, in other CCG's premises or premises of other organisations;
- All visitors to its premises including Contractors;
- All employees travelling to and from work areas on CCG business activities.

3. Accountability Arrangements

3.1 Chief Officer

The Chief Officer is accountable for ensuring the provision of high quality; safe and effective services delivered by safe systems of working, within Lewisham CCG, but delegate this responsibility to the Corporate Director.

3.2 Corporate Director

The Corporate Director is the director for Health and Safety within the CCG.

Duties include:

- To ensure that there are suitable systems in place to effectively manage health and safety.
- To obtain commitment from senior management to the health and safety risk management process encouraging them to promote health and safety awareness.
- To ensure that there are suitable and sufficient arrangements to assess risks to those that may be affected by the work activity.
- To ensure that there are reasonable resources allocated to eliminate or control the risks.
- To review all health and safety policies, reports and set health and safety objectives in order to monitor performance.

3.3 Directors

Directors are responsible and accountable for the effective implementation and proactive maintenance of this policy within their areas of managerial and individual responsibilities to ensure the safety of the public and staff members.

Those with the responsibility for managing or supervising staff are responsible and accountable for the effective implementation of this policy within their areas of managerial, supervisory and individual responsibility.

Directors have individual responsibilities in relation to working methods within their own areas in addition to a collective responsibility for Health & Safety.

Negligence or gross negligence with respect to such duties could result in unlimited fines or up to two year's imprisonment.

Duties include:

- Ensure that line managers fulfil their responsibility for Health & Safety, in particular provision of procedures and safe systems of work, and co-operating with audits to monitor compliance.
- Respond to requests from line managers to take appropriate remedial action to minimise risk following inspections, audits or

assessments.

- Ensure that members of staff attend mandatory training sessions on safety related matters
- Ensure compliance with the CCGs Incident Reporting Policy.
- Ensure that all areas within their Directorate comply with health & safety policies and procedures.
- Ensure that adequate resources are made available to departments.

3.4 Line Managers

All Line Managers have a responsibility for the day-to-day management of health and safety risks within their respective areas. Line Managers have a responsibility to report to their respective Managers significant health and safety risk issues. Further details are provided in Appendix 2.

Line Managers shall also be responsible for reporting, investigating and addressing work-related incidents/accidents. Refer to the CCG's Incident Reporting Policy for further guidance on accident reporting.

3.5 Staff

All employees have a duty to:

- Co-operate with the CCG on health and safety matters.
- Not recklessly interfere with/or misuse anything provided for health and safety
- Attend mandatory training
- Take reasonable care for their own safety, and others
- Report any Health and Safety concerns to their Line Manager and report any incidents, including near misses, in line with the Incident Reporting and management Policy.

3.6 Temporary Staff (including contracted staff)

The CCG affords the same rights to temporary staff as they do to employed staff with respect to health, safety and welfare issues. Temporary workers have a duty to co-operate with the CCG on health and safety matters.

3.7 Contractors

All contractors who work for the CCG will act in accordance with this policy with respect to the management of their health and safety.

4. Health and Safety Management Arrangements

4.1 Senior Management Team

- Has a collective role in providing health and safety leadership.
- Will ensure that all Governing Body decisions reflect the Health and Safety Policy.
- Will recognise its role in engaging the active participation of staff in improving health and safety. The team will ensure it is kept informed of and alerted to relevant health and safety risk management issues.
- The team will ensure appropriate resources are allocated for the management of health and safety risks within the CCG based on risk management principles.

4.2 Co-operation with other employers/landlords

In all sites which are shared with other employers, the CCG will ensure that staff will co-operate with these other CCGs and Local Authorities in matters of health and safety and notify them and Lewisham CCG of any activities which may affect their health and safety.

4.3 Risk Assessments

Risk assessment is the key to effective and sensible health and safety risk management. Risk assessments will be carried out in line with legal requirements. The findings from risk assessment shall be used to identify, prioritise and control risks at all levels, in accordance with the CCG's risk management arrangements as set out in the Risk Management Policy.

4.4 Health & Safety Group

The Health & Safety Group is established to plan and discuss health and safety matters and consists of members of the Corporate Directorate with Health & Safety responsibilities.

The Health & Safety Group will meet bi-monthly and report to the CCG SMT 6 monthly or as required.

4.5 Risk Documentation

All Health & Safety risks will be reported on the Corporate Risk Register on Datix. The Register is managed and updated by the AD of Integrated Governance in association with the risk owner/manager. The register will be monitored at the bi-monthly Health & Safety Group meetings with the Director responsible for Health

& Safety to review

- Risk Registers
- Incidents
- Action Plans
- Risk Assessments

5. Incident Reporting and Investigation

All work related accidents, incidents and near misses (whether they result in injury or not) should be reported using the CCG's Incident Reporting Policy.

Incidents and near misses should be reported using the CCG's DATIX Incident Reporting Form (within two working days of the incident) by clicking on the link below:

<https://lewishamccg.datix.thirdparty.nhs.uk/Live/index.php>

If access to this system is not available, staff should complete the Incident Reporting form (Appendix I in the Incident Reporting Policy) and send to lewccg.incidents@nhs.net within two working days of the incident to enable the logging of the incident. Staff must also inform their line manager within two working days of the incident.

When an accident has resulted in any physical harm, hospital admission or absence from work, this should be reported to the line manager. The CCG has a legal obligation to report certain incidents under the Reporting of Injuries, Diseases & Dangerous Occurrences Regulations (RIDDOR).

See the Incident Reporting Policy for further information.

6. Training

All employees are required to attend a face to face Health & Safety and Fire Training session every 3 years, alongside completing online Health & Safety and Fire Training annually via workforce.

7. Display Screen Equipment

All computer workstations will comply with the Health and Safety (Display Screen Equipment) Regulations 1992. A self-assessment of workstations can be undertaken by members of staff that use computers for most of their working day, forms can be found on the CCG intranet. Managers will be responsible for ensuring appropriate chairs and workstations are provided. After the self-

assessment, if significant risks are still present, further advice should be sought from Occupational Health.

8. New and Expectant Mothers

Pregnant employees will need to inform their manager who will need to undertake an individual risk assessment, taking into account the hazards this person is exposed to. Appropriate changes to workstations or working practices may need to be adopted.

Further guidance should be sought from Human Resources.

9. Young Persons

Young people in the workplace i.e. those under 18 years of age require an additional risk assessment prior to the start of their employment/work placement as stated in specific regulations pertaining to this group of workers.

10. Contractors/Temporary Staff

All contractors working on the CCG sites should be made aware of and co-operate with local health, safety, fire and security procedures.

11. First Aid

The CCG shall have a sufficient number of qualified first aiders or appointed persons proportionate with the level of risk.

An appropriate first aid kit is provided at all sites. Staff working at other sites must make themselves aware of the first aid facilities provided.

12. Security

Staff must wear a valid CCG identification badge when at work.

Staff must swipe in and out of the building when arriving and leaving. Any staff member without their pass must sign in and out at Reception.

Staff who are first in or last out must adhere to any opening/closing local procedures for the building in which they work (further details in the Lone Worker Policy)

13. Fire Safety

The CCG will ensure suitable and sufficient fire risk assessments are in place at all buildings occupied with their Staff. The risk assessments will comply with the Fire Safety (Regulatory Reform Order) 2005. The CCG will ensure the fire safety risks are appropriately managed.

Fire wardens will be appointed at all sites who will have the responsibility to co-ordinate any evacuation required (whether for fire, security or other emergency situation) and liaise with the relevant emergency services.

Managers will ensure members of staff are made aware of fire safety procedures including how to raise the alarm, available exits, assembly points, roll call and return to building procedure.

Further guidance can be found in the Fire Safety Policy.

14. Control of Substances Hazardous to Health

The CCG will eliminate exposure to hazardous substance in the workplace. Where hazardous substances cannot be eliminated, a risk assessment and suitable controls will be implemented to ensure that the substance is appropriately controlled.

The cleaning companies at all the buildings occupied with CCG's staff will be responsible for assessing and the appropriate control of substances that fall under the COSHH Regulations 2002.

15. Lone working

It will be the responsibility of managers to ensure staff are aware of the CCG's Lone Working Policy. It will be the responsibility of all staff, who work alone or in isolated circumstances, to adhere to the team lone working procedures.

16. Manual Handling

The Manual Handling Operations Regulations 1992 (amended in 2002) require employers to identify and assess all hazardous manual handling tasks, including lifting, lowering, pushing, pulling and carrying.

Risk assessments should be carried out on all tasks involving lifting and moving of heavy items.

For more information please refer to the Manual Handling Policy.

17. Personal Safety

Every effort will be made to protect staff whilst at work and the CCG work closely with TIAA Ltd for counter fraud and security management issues.

The CCG will put into place such control measures as to afford its staff the

maximum possible security whilst doing their job.

Staff should endeavour not to place themselves at risk. However, staff who feel threatened should in the first place seek the assistance of colleague/s and withdraw from a confrontational situation if the opportunity presents itself.

18. Working Time Regulations

The Working Time Regulations 1998 (amended 2003) state that staff should not work more than an average 48 hour week over a period of 17 weeks. Lewisham CCG is committed to ensuring that these limits are complied with.

Staff who work for 6 hours should have a break of at least 20 minutes during this period.

Staff should receive a minimum of 11 hours break between shifts and have a minimum of 24 hours break every 7 days.

19. Health and Safety Information/Communication

The CCG will use the intranet for health and safety related information. Health and safety posters and notices are displayed prominently at all sites with contact details of the competent persons.

The CCG will use email and the team briefing system to ensure that members of staff are briefed on relevant health and safety issues on a regular basis.

20. Dissemination and Implementation

This policy has been circulated to Directors, for dissemination to all staff at all levels.

This policy has been circulated by email and posted on the Intranet under policies on the web page.

21. Approval and Ratification

The Staff Engagement Group will review and make recommendations to the Senior Management Team who are responsible for approving this policy.

22. Review

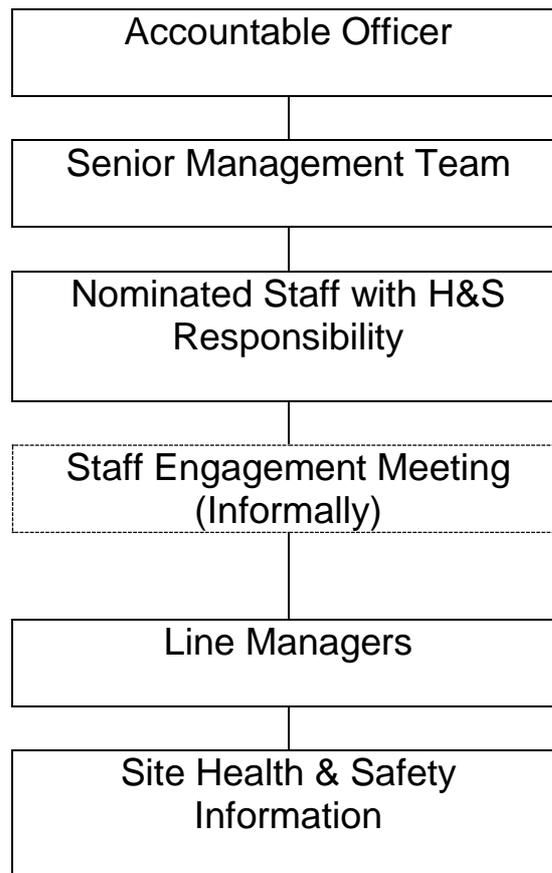
The Health and Safety Policy will be reviewed on an annual basis.

Amendment History

Version	Date	Reviewer Name(s)	Comments
1.1	Nov 2017	Katie Hitchen	Approved February 2018

Appendix 1

Health and Safety Structure



Appendix 2

Health and Safety Responsibilities for Line Managers

To ensure, as far as is reasonably practicable, the health, safety and welfare of staff, visitors and contractors who may be affected by activity for which they are responsible in the workplace.

Line Managers will conduct risk assessments and implement suitable and sufficient controls of the risk identified for their own area of responsibilities. This will be done by:

- Identification of hazards to health and safety in the workplace and work practices
- Ensure adequate resources are provided (including time allowance for staff taking on additional roles to comply with this policy)
- Reducing or removing hazards which are within their control.
- Drawing to the attention of Partners, shortcomings that are not within their control and recommending changes to be made together with acceptable priorities and placing insufficiently controlled health and safety risks on the risk register.
- Ensure that Safe Systems of work are developed are suitable and sufficient.
- Monitor changes in work practices and workplaces to assess the effect on safe working.
- Ensure that health and safety related policies, including the Health and Wellbeing Policy, are applied and routinely monitored.
- Investigate actual and potential unsafe practices.
- Maintain records of health and safety training provided for staff.

Appendix 3 – Summary of relevant legislation

Health and Safety at Work etc Act 1974

Employer responsibilities are

“to ensure, as far as is reasonably practicable, the health, safety and welfare of all his/her employees”

The Act states that so far as is reasonable and practicable the Employer must

- provide information, training, instruction and supervision to ensure Health and Safety.
- provide a work system and working environment that is safe and without risks to health.

However, an Employer needs to comply with this duty only when the cost of providing eg equipment and training is not grossly disproportionate to the benefit.

Employee responsibilities are that they

“must take reasonable care of their own health and safety, the safety of anyone who may be affected by their acts or omissions, and co-operate with the employer”

Management of Health and Safety at Work Regulations 1999

Employers must:-

- develop a general framework for safety management;
- make suitable and sufficient assessment of the risks to the health and safety of their employees to which they are exposed whilst they are at work;
- aim to enhance any control measures

provided. Employees must:-

- use all equipment provided by employer in accordance with training and instruction;
- notify employer of unsafe conditions.

Manual Handling Operations Regulations (1992)

In 1988 an EU Directive required the Employer to

“make an assessment of the risk of injury and take the necessary control measures in connection with the use, handling, storage and transport of articles”

Regulation 4 of the Regulations states –

- Avoid manual handling operations where there is a risk of injury so far as is reasonably practicable.
- When hazardous Manual Handling operations cannot reasonably & practicably be avoided then an assessment of the Task, Load, Working Environment and Individual capabilities of the person performing the task must be made.
- On that basis the employer must reduce the risk to the lowest level that is reasonably practicable.
- This assessment must be kept up to date and the employee must be given a general indication of and, where reasonably practicable, precise information on, the weight of the load.

This assessment should be recorded and made readily available.

Workplace (Health, Safety and Welfare) Regulations 1992

Employers, Controllers and Landlords have a duty of care to ensure the layout design and management of facilities are safe for persons working or visiting in or around premises used as a workplace.

Approved Code of Practice – Management of Health & Safety at Work 1999

A risk assessment should be carried out to identify the risks to health and safety to any person arising out of, or in connection with, work or the conduct of their undertaking. It should identify how the risks arise and how they impact on those affected.

This information is needed to make decisions on how to manage those risks so that the decisions are made in an informed, rational and structured manner, and the action taken is proportionate.

The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)

Certain injuries and incidents are reportable to the authorities. These injuries are those that result from events related to work activity and an employees' subsequent incapacity to do normal work. The injuries include (but not solely) amputations, fractures, inability to do normal work for greater than 3 days.

The Health and Safety (Display Screen Equipment - DSE – Regulations) 1992

A duty of care is owed by the employer to those working with DSE (i.e. VDU's). Users are defined through a risk assessment process and should be protected from the hazards associated with DSE.