

Health and Safety Policy

Version	V8.0
Supersedes:	V7.0
Date Ratified by Board:	26 th March 2020
Reference Number:	PC24POL9
Title & Department of originator:	Executive Director of Nursing and Quality
Title of responsible Group / department:	PC24 Quality Governance Group
Effective Date:	8 th April 2020
Next Review date:	March 2024 or sooner if required or change in legislation
Target audience:	All employees
Impact Assessment Date:	3 rd March 2020
Summary	This policy applies to all employees and is intended to safeguard the health, safety and wellbeing of employees, visitors and contractors connected with the work of Primary Care 24.

Version	Date	Control Reason	Title of Accountable Person for this Version
V7.0	3 rd March 2020	This version has been extensively revised following a review and advice of external consultants Estates Strategy Group. It takes account of current best practice advised by the HSE.	Executive Director of Nursing and Quality
V8.0	Jan 2021	1 st review since extensive revised version (V7.0).	Health, Safety & Governance Officer
Reference Documents		Electronic Locations (Controlled Copy)	Location for Hard Copies
Please see legislation section and to be read in conjunction with Fire Plan SOP		Primary Care 24 Intranet	Policy File, Wavertree Headquarters
Consultation: (Committees / Groups / Individual) SMT, Policy Group, Quality & Workforce Committee & Board			Date: 26.03.2020

Contents

1. HEALTH AND SAFETY POLICY STATEMENT	1
2. INTRODUCTION	3
2.1. POLICY STATEMENT	3
2.2. BACKGROUND	3
2.3. PURPOSE	4
2.4. SCOPE OF THE POLICY	5
2.5. POLICY INTERPRETATION	5
2.6. RELATED POLICIES & STANARD OPERATING PROCEDURES	5
2.7. MAIN REFERENCES	6
2.8. INFORMATION, INSTRUCTION AND TRAINING	7
2.9. EQUALITY AND HEALTH INEQUALITIES (move)	8
2.10. PERSONAL INFORMATION (move)	9
3. ROLES AND RESPONSIBILITIES	9
3.2. CHIEF EXECUTIVE OFFICER	10
3.3. EXECUTIVE AND NON-EXECUTIVE DIRECTORS	10
3.4. DIRECTOR OF NURSING & QUALITY	10
3.5. QUALITY & WORKFORCE COMMITTEE	11
3.6. THE HEALTH & SAFETY GROUP	11
3.7. HEALTH, SAFETY & GOVERNANCE OFFICER	12
3.8. ALL MANAGERS	13
3.9. EMPLOYEES	14
3.10. CONTRACTORS AND VISITORS	15
3.11. ORGANISING CONTROL & GOVERNANCE	15
3.12. TRAINING	16
3.13. PLANNING AND IMPLEMENTING	17
4. MONITORING COMPLIANCE - THE HEALTH & SAFETY GROUP	20
4.2. MEASURING PERFORMANCE	21
4.3. AUDITING & REVIEWING PERFORMANCE	22
5. LEGAL CONSIDERATIONS	23
5.1. CORPORATE MANSLAUGHTER AND CORPORATE HOMICIDE ACT 2007	23
5.2. HEALTH AND SAFETY AT WORK ACT 1974 (HSAW)	23

5.3. RIDDOR.....	24
6. POLICY PROCEDURES	24
6.2. RISK ASSESSMENTS	25
6.3. DYNAMIC RISK ASSESSMENTS.....	26
6.4. ACCIDENT/INCIDENT REPORTING AND INVESTIGATION	26
6.5. FIRST AID AND FIRST AID ASSESSMENT	28
6.6. EMERGENCY PROCEDURES AND FIRE SAFETY EVACUATION	29
6.7. MANAGEMENT OF CONTRACTORS	30
6.8. DISPLAY SCREEN EQUIPMENT (DSE)	31
6.9. EQUIPMENT, MATERIALS AND SUBSTANCES	32
6.10. PREMISES	34
6.11. HOMEWORKERS.....	34
6.12. LONE WORKERS.....	35
6.13. BULLYING AND HARASSMENT IN WORKPLACE	35
6.14. MANAGING TELEPHONE VERBAL ABUSE	36
6.15. DRIVING	36
6.16. STRESS	37
6.17. SUBSTANCE MISUSE	38
APPENDIX A – HEALTH & SAFETY GROUP TERMS OF REFERENCE	40
APPENDIX B – RISK ASSESSMENT TEMPLATE	45
APPENDIX C – PC24 HEALTH & SAFETY GROUP REPORTING STRUCTURE	46
APPENDIX D – HEALTH AND SAFETY TRAINING NEEDS ANALYSIS	47

1. HEALTH AND SAFETY POLICY STATEMENT

- 1.1.1. This is the Health and Safety policy statement of Primary Care 24 dated 3rd March 2021.
- 1.1.2. The Primary Care 24 (PC24) Board of Directors and I are totally committed to ensuring the health, safety and PC24 wellbeing of all staff, patients, contractors and members of the public who are in any way affected by the undertaking of PC24 activities.
- 1.1.3. PC24 will ensure there are appropriate resources in place to conduct our activities in accordance with all statutory and regulatory requirements. PC24 will ensure staff working from other host employer premises will have access to local inductions covering the sites health and safety arrangements.
- 1.1.4. As well as developing the Health and Safety Policy, PC24 will continue to implement new policies and procedures and communicate them effectively to staff. PC24 will continue to monitor the effectiveness of our policies and procedures and complete regular monitoring activities such as audits.
- 1.1.5. In delivering on our aims, PC24 expect all staff and contractors to conduct themselves in a safe manner ensuring the health and safety of themselves and others at all times.
- 1.1.6. It is the policy of PC24 to foster a positive health and safety culture throughout the organisation because PC24 believe that high standards of health and safety are a moral and effective pre-requisite. The organisation is committed to:
- Working to prevent accidents and work-related ill health
 - Ensuring any risks arising from our work activities are properly managed
 - Maintaining safe and healthy working conditions, and adequate welfare facilities

- Using and maintaining appropriate equipment required to undertake our work including all Personal Protective Equipment where needed
- Ensuring the safety of our employees, visitors and customers at all times

1.1.7. This policy will be reviewed in 1 year then 3 yearly or sooner if national guidance or legislation required, or if there are changes to PC24's internal processes.

1.1.8. PC24 will deliver the following objectives, along with any others that are assigned by PC24 Committees or the Board of PC24 during the course of the year. Our stated aims and objectives are:

- To lead the development and implementation of a Health & Safety Improvement Plan
- To oversee and monitor the implementation of this Improvement Plan
- To provide expert advice to the organisation regarding all aspects of Health & Safety, including national policy initiatives, ensuring that the implementation of those national policies that require action locally are successfully implemented and that relevant stakeholders are involved or informed as appropriate
- To receive and monitor Service Delivery Unit's Health & Safety Assurance Reports
- To develop, review and endorse Health & Safety policies and procedures
- To promote, facilitate and monitor training and education of PC24 staff in relation to Health & Safety
- To assist in promoting a safer culture within PC24
- To improve systems for safer care throughout the organisation and reduce harm to service users and staff
- To undertake and review premises Risk Assessments

The Chief Executive of accepts overall responsibility for all Health and Safety within the Company and is responsible for all policy implementation.

Signed by Dr Mary Ryan Chief Executive

Signature:

Date:

2. INTRODUCTION

2.1. POLICY STATEMENT

- 2.1.1. PC24 understands its responsibilities for Health & Safety towards employees, customers, visitors and members of the public and has a clear, written policy for health and safety at work, signed, dated and communicated to all employees. Responsibilities for various elements are delegated as shown below.
- 2.1.2. The Chief Executive Officer and Directors regard health and safety of employees as an important business objective.
- 2.1.3. The Chief Executive Officer and Directors are committed to continuous improvement in health and safety (reducing the number of injuries, cases of work-related ill health, and absences from work and accidental loss).
- 2.1.4. The Director of Nursing and Quality is the named Director with overall responsibility for implementing this health and safety policy.
- 2.1.5. This policy commits the PC24 Directors to preparing regular health and safety improvement plans and regularly reviewing the operation of its health and safety policy overseen by the Health and Safety Group.
- 2.1.6. This policy includes a commitment to ensuring that all employees are competent to do their jobs safely and without risks to health.
- 2.1.7. This policy encourages the involvement of employees and safety representatives in the health and safety effort. The Health & Safety Group will be represented by a wide range of PC24 staff.

2.2. BACKGROUND

- 2.2.1. Primary Care 24 (PC24) is a Social Enterprise organisation. From 1st April 2021 PC24 will deliver a range of urgent and primary care services to just under 1.4 million people across Halton, Knowsley, Liverpool, St Helens,

Sefton and Warrington.

- 2.2.2. PC24 is the established local provider of Out of Hours Services to residents of Halton, Knowsley, Liverpool, St Helens Sefton and Warrington.
- 2.2.3. The Pathfinder service enables the North West Ambulance Service to contact PC24, 24 hours a day, to refer any patients they have assessed as more suited to a primary care assessment by a clinician.
- 2.2.4. PC24 offer a wide range of Primary Care services operating during daytime hours, including:
- Sefton GP practices: We work closely with local staff and partners to deliver primary services from a number of GP practices in Sefton.
 - Knowsley Primary Care Service: Any Knowsley registered patient requiring GP input can access a 'same day' appointment. The service is delivered from a number of sites across Knowsley.
 - Extended Access Service: Any Liverpool, St Helen's and Warrington registered patient requiring GP input can access a 'same day' appointment.
 - Intermediate Care Service: Patients requiring some clinical care, but not enough for a hospital may be referred to this service, along with patients whose GP refers them into the service for care.
 - Asylum Service: Provides health screening and medical assessments to asylum seekers who have recently arrived in Liverpool.
 - NHS 111 First: This is a telephone clinical triage service covering the Warrington area.
- 2.2.5. The nature of work for PC24 employees is therefore essentially office based with some home visits, home working and lone working. This policy is written to take account of this working context.

2.3. PURPOSE

- 2.3.1. If an employer has five or more employees, the UK law requires the employer to have a written policy in place for managing health and safety.

- 2.3.2. This health and safety policy details PC24's general approach to health and safety. It explains how as an employer, PC24 will manage health and safety in its business functions. The policy explains how health and safety will be governed and managed on a daily basis to prevent or minimise the risk of accidents or injury to employees, service users, visitors and contractors in the working environments.

2.4. SCOPE OF THE POLICY

- 2.4.1. Compliance with Health and Safety legislation applies to both the employer and all employees. Therefore, this policy applies to all employees, temporary workers, bank staff, visitors and any contractors of PC24.
- 2.4.2. Health and Safety legislation is criminal law and failure to comply with policies, training or standards could lead to a criminal prosecution of the organisation or an individual.

2.5. POLICY INTERPRETATION

- 2.5.1. The Director of Nursing and Quality and the Health, Safety & Governance Officer are responsible for this Health and Safety policy and should be contacted if any policy interpretation is required or to help resolve any related problems or other special situations should they arise.

2.6. RELATED POLICIES & STANDARD OPERATING PROCEDURES (this needs to move in line with pc24 policy template0

- 2.6.1. There are a number of policies and SOPs which relate to health and safety including:
- PC24POL104 The Lone Worker Policy
 - OP081 Operational Support / GP Home Working
 - PC24POL102 Raising a Concern (Whistleblowing) Policy

- PC24POL70 Medicines Management Policy
- PC24POL123 Controlled Drug Policy
- PC24POL125 Non-Medical Prescribing Policy
- AD321 Wavertree Headquarters Fire Plan Procedure
- PC24POL21 Bullying and Harassment in the Workplace
- PC24POL14 Disciplinary Policy
- PC24POL32 Policy for Managing Incidents and Serious Incidents
- OP040 Home Visit Driver Shift Procedure
- PC24POL 48 Alcohol and Substance Misuse Policy
- SOP H&S 001 Emergency Evacuation Procedure Wavertree HQ
- SOP H&S 002 Working At Height
- SOP H&S 003 Working from home during Covid-19 (DSE)
- SOP H&S 044 Gritting – snowy, icy weather conditions

2.7. MAIN REFERENCES

2.7.1. Footnote references are incorporated into this policy to provide further guidance to both managers and employees to help them better understand their responsibilities and action which can and should be taken to mitigate, avoid, and reduce health and safety risks facing employees, visitors and contractors.

2.7.2. The Health and Safety Executive (HSE) website¹ has a vast amount of information on every aspect of health, safety and welfare of employees. It lists the relevant legislation, UK Acts of Parliament owned and enforced by HSE.² Key legislation relevant to this policy includes:

- Health and Safety at Work etc. Act 1974 (c. 37)
- Factories Act 1961 (c. 34)
- Explosives Act 1875 (c. 17)

¹ <https://www.hse.gov.uk/>

² <https://www.hse.gov.uk/legislation/acts.htm>

- Environment and Safety Information Act 1988 (c. 30)
- Health and Safety (Offences) Act 2008 (c.20)
- Offices, Shops and Railway Premises Act 1963 (c. 41)
- Equality Act 2010
- Data Protection Act 2018
- Corporate Manslaughter and Corporate Homicide Act 2007
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013
- The Management of Health and Safety at Work Regulations (1999)
- The Health and Safety (Display Screen Equipment) Regulations 1992
- Electricity at Work Regulations 1989
- Workplace (Health & Safety) Regulations 1992
- Health and Safety (First Aid) Regulations 1981

2.8. INFORMATION, INSTRUCTION AND TRAINING

- 2.8.1. This policy details what information, instruction, training and supervision is necessary for both employees and managers in order to meet the policy requirements. It details when, how often and by whom the training should be given.
- 2.8.2. As part of the PC24 staff induction process, all employees will receive mandatory health and safety training on appointment then three yearly thereafter.
- 2.8.3. All employees will receive training on being exposed to new or increased risks due to:
- Their role being transferred or given a change of responsibility
 - The introduction of new work equipment/vehicles or changes to existing equipment/vehicles
 - The introduction of new technology
 - The introduction of a new system of work or changes in existing

systems of work

- 2.8.4. Managers will be provided with health and safety training including risk assessment, relevant to their positions.
- 2.8.5. PC24 will provide staff with information regarding health and safety as appropriate.
- 2.8.6. PC24 will promote, facilitate and monitor training and education of all staff in relation to Health and Safety. It will have a system in place for ensuring that people doing particularly hazardous work or exposed to hazardous situations have the necessary information, instruction and training to carry out the work safely.
- 2.8.7. Health and safety training will be a standard agenda item on PC24's Health and Safety Group
- 2.8.8. PC24's Training Manager will be a member of the Health and Safety Group and ensure that identified training requirements are incorporated into relevant staff induction and annual training plans. In addition, that all H&S training is logged in staff training records.
- 2.8.9. PC24 will make arrangements to ensure managers continue to check that information, instruction and training has been fully understood by staff and continues to be acted upon.

2.9. EQUALITY AND HEALTH INEQUALITIES (move)

- 2.9.1. PC24 is committed to an environment that promotes equality and embraces diversity in its performance as an employer and service provider. It will adhere to legal and performance requirements and will mainstream equality and diversity principles through its policies, procedures and processes.
- 2.9.2. This policy has been implemented with due regard to this commitment. To ensure that the implementation of this policy does not have an adverse impact in response to the requirements of the Equality Act 2010 this policy

has been screened for relevance during the policy development process and a full equality impact analysis conducted where necessary.

- 2.9.3. PC24 will take remedial action when necessary to address any unexpected or unwarranted disparities and monitor practice to ensure that this policy is fairly implemented.
- 2.9.4. Specifically, in relation to disability, the UK Equality law recognises that bringing about equality for disabled people may mean changing the way employment is structured, the removal of physical barriers and/or providing extra support for a disabled worker. This is the duty to make reasonable adjustments.
- 2.9.5. The aim of the duty and the policy of PC24 is to make sure that, as far as is reasonable, a disabled worker has the same access to everything that is involved in doing and keeping a job as a non-disabled person.

2.10. PERSONAL INFORMATION (move)

- 2.10.1. PC24 is committed to an environment that protects personal information aspects in the development of any policy. When proposing any changes to this policy, there is a new requirement for policy writers to investigate whether the personal information aspect of the policy complies with the data protection principles in Schedule 1 of the Data Protection Act 2018.
- 2.10.2. All individuals with responsibility for reviewing/writing this policy should consider Privacy Impact Assessment compliance.
- 2.10.3. This policy complies with the Data Protection Act (2018); therefore, no Privacy Impact Assessment is necessary.

3. ROLES AND RESPONSIBILITIES

- 3.1.1. This section describes the responsibilities and duties of both management and employees. It includes specific responsibilities or functions that a particular post or department may have, relevant to the policy or its

implementation.

3.2. CHIEF EXECUTIVE OFFICER

3.2.1. The Chief Executive Officer has overall accountability for the implementation of the Health and Safety Policy and is responsible for:

- Ensuring this policy is implemented and reviewed
- Providing visible and active commitment to the compliance with all relevant Health and Safety legislation
- Ensuring sufficient resources are allocated to implement:
 - The Health & Safety Policy
 - the development of a positive health and safety culture
 - compliance with current legislation

3.3. EXECUTIVE AND NON-EXECUTIVE DIRECTORS

3.3.1. Have corporate responsibility to provide a safe working environment and shall ensure adequate arrangements and resources are provided to implement the requirements of this policy, all relevant Safety Regulations and any associated procedures and safe systems of work; and apply this within their respective areas of responsibility. They will ensure Health and Safety arrangements are adequately resourced, obtain competent advice, review reports, performance and action plans to ensure compliance.

3.4. DIRECTOR OF NURSING & QUALITY

3.4.1. The Director of Nursing & Quality has delegated executive responsibility for health and safety in particular for:

- informing the board on all relevant Health and Safety management issues, including alerting the Board to the requirements of this policy and any actual or potential breaches of Health and Safety legislation;
- ensuring, through the governance structure, relevant persons are consulted with and informed of any changes which may substantially affect their health and safety e.g. in procedures, equipment or ways of

working;

- ensure clear lines of accountability throughout the organisation for the management of health and safety
- ensuring staff are provided with information on the likely risks and dangers arising from PC24 work activities, introduce measures to reduce or eliminate those risks and inform staff as to what they need to do if they have to deal with a risk
- putting arrangements in place to ensure that competent people help them satisfy health and safety legislative requirements
- ensuring co-ordination and co-operation on health and safety matters between PC24, its stakeholders and contractors
- ensuring suitable plans are in place to manage health and safety
- ensuring adverse health and safety consequences of introducing new technology, equipment or procedures and ways of working are mitigated so far as is reasonably practicable

- 3.4.2. Ensure PC24 has a robust Health and Safety Policy outlining the commitment of PC24 to ensure the Health and Safety of all persons who either work for or come into contact with PC24.

3.5. QUALITY & WORKFORCE COMMITTEE

- 3.5.1. Responsible for monitoring and having oversight of health and safety activities and training, giving assurance to the Board. They will gain assurance by monitoring Health and Safety plans, which will be presented to the committee by the Health and Safety Group and through the Quality dashboard.

3.6. THE HEALTH & SAFETY GROUP

- 3.6.1. Act in accordance with the Health & Safety at Work Act 1974 and other relevant Health and Safety legislation and guidance ensuring compliance with this policy. See [section 2.6](#).
- 3.6.2. They will be familiar with and ensure that health and safety legislation, codes of practice and guidance documents issued and addendums to the policy are complied with. Special attention will focus on staff training,

incident/accident reporting, health and safety compliance and measures to reduce risk in all practices.

3.6.3. Regularly monitor and review all exiting PC24 Health and Safety policies and procedures and ensure they are readily available to all staff and that changes are effectively communicated and robustly implemented.

3.6.4. The details and functions and the Terms of Reference for this group and the means of making contact with its members can be found on PC24's intranet.

3.7. HEALTH, SAFETY & GOVERNANCE OFFICER

3.7.1. The Health & Safety Officer will facilitate managers in fulfilling their health and safety responsibilities as part of the organisation's Integrated Risk Management Strategy and liaise effectively with external agencies on behalf of PC24. Some key responsibilities include:

- Responsibility for the development of health and safety training and ensuring implementation strategies facilitate compliance and contribute to PC24's broader strategy
- Analyse Health and Safety related adverse events, ensuring appropriate investigation, production of reports and reporting as appropriate
- Analyse Health & Safety data, producing reports as necessary for relevant groups, identifying trends and recommending consequential change as required
- Assist in the development production and delivery of strategies which ensure PC24's compliance with statutory, national and local regulations and PC24's policies
- Prepare and deliver as required reports to various forums where Health and Safety is discussed; reports will identify both compliant and non-compliant areas
- Coordinate visits and inspections from external inspectors and the provision of documents which may be requested by them
- Provide expert advice and guidance on health and safety policy, guidance and assessment, including risk assessments.

3.8. ALL MANAGERS

3.8.1. Managers at all levels with ensure:

- They have or undertaken to obtain such information, instruction and training to enable them to lead on matters of health and safety within their respective roles
- All risk assessments are systematically reviewed and where necessary ensure suitable standard operating procedures and plans are further updated or developed to provide adequate controls and safety precautions;
- Work in collaboration with others to provide suitable and sufficient equipment which is serviced and maintained and put systems and procedures in place to control and safely manage any identified risks
- Discuss and disseminate PC24 safety policies and procedures and implement the requirements of those respective policies and procedures to ensure cooperation and communication
- Make adequate funding available to provide any necessary equipment, procedures and ongoing training and supervision to meet the requirements of this policy and/or where a risk assessment has identified such control measures as being necessary
- Health and Safety performance standards and objectives are set for those under their supervision
- Manage the timely reporting of accidents and incidents in accords with PC24 policy
- Investigations are undertaken, the incident reporting process is followed and the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) procedures are followed, where necessary
- Intervene to prevent poor Health and Safety practice or procedures
- Action is taken against any member of staff who ignores or deliberately fails to discharge their responsibilities for Health and Safety
- Their staff attend the appropriate training, including induction training, local induction and familiarisation, mandatory and statutory training and any other training that is deemed necessary
- They maintain a system of regular inspections and audits to determine the degree of compliance and take appropriate remedial action to address any areas of non-compliance

- Ensure that all staff, including bank, agency, students, persons gaining work experience, temporary, young or inexperienced workers, disabled staff, pregnant and nursing mothers, lone workers contractors and others under their supervision are afforded the same level of protection as any other PC24 member of staff
- Health and Safety matters are incorporated as necessary into job descriptions, appraisals, team meetings and escalated through the appropriate PC24 structures and policy
- Investigate complaints by any employee relating to the health, safety or welfare at work
- Promote a positive Health and Safety culture and environment

3.9. EMPLOYEES

- 3.9.1. All employees will take reasonable care for the health and safety of themselves and any other persons who may be affected by their acts or omissions at work. This **duty** not only relates to avoiding obvious reckless behaviour, but also includes taking positive steps to understand the hazards in the workplace, to comply with safety rules and procedures and to ensure that nothing they do or fail to do places others at risk.
- 3.9.2. All employees must cooperate with their Line Managers to maintain safe systems. Every employee has the right to expect the organisation to provide a safe environment and systems of work. Every employee has an obligation to ensure that any activity or omission on their part does not create a risk or hazard to themselves or others.
- 3.9.3. Highlight potential hazards, risks and dangerous occurrences in the workplace and to be proactive by assisting in preventing accidents and adverse incidents in the workplace
- 3.9.4. Inform PC24, through the PC24's incident reporting system, Datix, of;
- Any work situation which the employee would reasonably consider represent a serious and immediate danger to health and safety
 - Any matter which the employee would reasonably consider represent a shortcoming in the employer's protection arrangements for health and safety

- Any non-compliance with PC24 policies and procedures introduced in the interest of safety.
- Take responsible care of their own Health and Safety and of others who may be affected by what they do or do not do

3.10. CONTRACTORS AND VISITORS

- 3.10.1. Staff who engage with contractors will be responsible for giving information/details of any specific hazards in the place of work so that the contractor will be aware of PC24's health and safety requirements.
- 3.10.2. All visitors to PC24 will be met at reception or entrances to PC24 premises and will be asked to sign in and out when entering and exiting the premises. Visitors will be escorted around the building by the person they are visiting/meeting.
- 3.10.3. If visitors are in a PC24 building and an emergency evacuation takes place, the visitors will be escorted from the premises to the fire assembly point by the persons they are visiting /meeting.

3.11. ORGANISING CONTROL & GOVERNANCE

- 3.11.1. PC24 will provide clear information to people working on our sites about the hazards and risks and about the risk control measures and safe systems of work relevant to their work area. This applies to persons working on behalf of PC24 and irregular visitors.
- 3.11.2. PC24 will discuss health and safety regularly and health and safety is on the agenda of management meetings and briefings.
- 3.11.3. For contractors and employment agencies whose employees work on our site, PC24 have arrangements for cooperating and coordinating on health and safety matters.
- 3.11.4. PC24 Directors and managers will be open and approachable on health and safety issues and encourage their staff to discuss health and safety matters. Staff who feel unable to raise issues with a manager can do so

by contacting the Health, Safety and Governance Officer or under the PC24 Raising a Concern (Whistleblowing) Policy.

- 3.11.5. All PC24 staff will communicate their commitment to health and safety through their behaviour and by always setting a good example.
- 3.11.6. Where applicable PC24 will establish clear feedback systems to staff on safety issues, such as drivers breaching traffic rules, or not wearing Personal Protective Equipment (PPE) etc.
- 3.11.7. PC24 involve the workforce in preparing health and safety improvement plans, reviewing our health and safety performance, undertaking risk assessments, preparing safety-related rules and procedures, investigating incidents and problem solving.
- 3.11.8. PC24 will consult our employees and employee safety representatives on all issues that affect health and safety at work.
- 3.11.9. PC24 will have an active Health and Safety Group that is chaired by the appropriate Director or Senior Manager and on which employees from all departments are represented.

3.12. TRAINING

- 3.12.1. PC24 will have a system in place for ensuring that all its employees, including managers and temporary staff, are adequately instructed and trained.
- 3.12.2. PC24 will assess the experience, knowledge and skills needed to carry out all tasks safely.
- 3.12.3. PC24 will have a system in place for ensuring that people doing particularly hazardous work or exposed to hazardous situations have the necessary information, instruction and training to carry out the work safely.
- 3.12.4. PC24 will have systems in place for ensuring that competence needs are identified and met whenever PC24 take on new employees, promotes or

transfers people, or when people take on new health and safety responsibilities, for example, when PC24 restructure or reorganise. In support of this, a health and safety training needs analysis has been undertaken (see **Appendix D**) to ensure the relevant training is provided to staff at all levels of the organisation.

3.12.5. PC24 will have systems in place for the selection of contractor companies and their personnel entering our organisation. Before contracts are agreed upon, PC24 will ensure they have the right level of technical and safety competence.

3.12.6. PC24 will have systems for ensuring that competence needs are identified and met whenever PC24 take on contracted or agency personnel and PC24 have systems to assess the individual can carry out tasks safely.

3.13. PLANNING AND IMPLEMENTING

3.13.1. PC24 will have a system for identifying hazards, assessing risks and deciding on how they can be eliminated or controlled. [Section 6](#) details some specific procedures.

3.13.2. PC24 will set standards against which they can measure health and safety performance.

3.13.3. PC24 will have a system for planning and scheduling health and safety improvement measures and for prioritising their implementation depending on the nature and level of risk. An H&S Improvement Plan referred to at [section 4.1.7](#) above will be developed, implemented and monitored by the H&S Group.

3.13.4. PC24 will have arrangements for agreeing measurable health and safety improvement targets with our managers and managers. These will be determined and overseen by the Health and Safety Group.

3.13.5. Should PC24 decide to purchase further premises, plant, equipment and hazardous materials, it will take health and safety into account at the

appropriate stage, by undertaking a risk assessment before implementation of the plan or activity.

- 3.13.6. PC24 have a Medicines Management Team and arrangements in place to deal with any medicine/drug errors or issues. PC24 also have established policies and procedures in place for ensuring that medicines are handled safely and securely. These documents include roles and responsibilities and highlight the procedures and guidelines to be followed within PC24 for the prescribing, ordering, storing, administration and issuing of medicines.
- 3.13.7. Whilst PC24's processes, equipment, procedures, systems of work and tasks are well established and risk assessed, it will take proper account of health and safety issues should any changes be considered.
- 3.13.8. PC24 will have arrangements for dealing with emergency situations, or serious and imminent dangers which includes assigning certain roles and responsibilities to persons. PC24 has separate policies relating to Emergency Procedures and Fire Safety evacuation. See [section 6.6](#) below.
- 3.13.9. PC24 will have health and safety rules and procedures covering the significant risks that arise in our day-to-day work activities including normal operations, foreseeable abnormal situations and maintenance work.
- 3.13.10. PC24 will have formally stipulated and agreed safety specifications for static plant (physical or electrical) and equipment used within our organisation, they include requirements to fit certain safety control devices as required i.e. interlock systems, guarding, e-stops etc.
- 3.13.11. PC24 will have arrangements for dealing with unplanned / ad-hoc work activities, in identifying the hazards, assessing the risks and deciding how they can be eliminated or controlled. Managers will be trained how to undertake risk assessments when incidents arise. See [section 6.3](#) below.

- 3.13.12. PC24 will have arrangements for ensuring that unauthorised operation of plant (physical or electrical) and equipment is effectively prevented. In the office environment, computer servers and hubs will be located in secure rooms and accessed only by authorised personnel.
- 3.13.13. PC24 will have arrangements for performing 'Pre use' safety checks on vehicles, plant and equipment assessed as requiring such an inspection. For example, electrical PAT testing will be undertaken on all electrical equipment.
- 3.13.14. PC24 will have procedures and arrangements for dealing with defects / breakdowns which occur during the course of work. Only authorised staff will rectify defects or breakdowns.
- 3.13.15. PC24 will have arrangements for performing routine premises inspections (including any sites) which includes behavioural safety³. In line with [section 6.2](#) all premises will be risk assessed and action taken to remove, reduce or mitigate any hazards.
- 3.13.16. PC24 will have procedures for maintaining good housekeeping standards to minimise the risk of slips and trips. Such mitigating activities will be included in all risk assessments.
- 3.13.17. Staff will **NOT** be permitted to work from height by standing on desks or chairs. Where working at height is required suitable equipment will be provided and PC24 procedures will be followed.
- 3.13.18. PC24 will have a system for identifying Manual Handling hazards, assessing risks and deciding how they can be eliminated or controlled.
- 3.13.19. PC24 will have arrangements for ensuring employees are made aware of, and are provided with the personal protective equipment which has been assessed as being required for a particular work activity.
- 3.13.20. PC24 will ensure that welfare facilities, including the provision of facilities

³ <https://www.hse-network.com/news-articles/behavioural-safety-approaches-to-hse-management/>

that are necessary for the well-being of employees, such as washing, toilets, and rest areas and somewhere clean to eat and drink during breaks⁴ are provided, are suitable and are sufficient to the work environment and those who will be required to use them i.e. staff, visitors, contractors.

3.13.21. PC24 will introduce local policies where health, safety and welfare may present risks e.g. hot desking, eating food at workstations.

4. MONITORING COMPLIANCE - THE HEALTH & SAFETY GROUP

- 4.1.1. A Health & Safety Group has been established and will be responsible for ensuring compliance with this policy.
- 4.1.2. The current Terms of Reference of the Health & Safety Group are contained at **Appendix A** of this policy. **Annex 1** of the appendix contains the standard agenda of items to be discussed. **Appendix C** illustrates the Health and Safety Group's reporting structure.
- 4.1.3. The Health and Safety Group will make arrangements to analyse the causes of any potentially serious events so as to identify the underlying root causes including causes arising from shortcomings in our safety management system and safety culture.
- 4.1.4. The Health and Safety Group meetings will take place quarterly, escalating as required any concerns to PC24 Leadership Team. It will report to the PC24 Quality Governance Group on a bi-monthly basis, which in turn will report into the Quality and Workforce Committee providing assurance to PC24 Board.
- 4.1.5. The action points shall be formally recorded by the Director of Nursing and Quality's Executive Assistant and submitted to the Quality Governance

4

<https://www.hse.gov.uk/pubns/indg293.htm>

Group along with a highlight report as required. The Chair shall draw attention to any matters relevant for action, for example matters reportable to regulators or insurers

- 4.1.6. A baseline compliance audit against this policy will be undertaken to identify areas where activities and procedures should be strengthened.
- 4.1.7. A Health and Safety Improvement Plan will identify activities to improve compliance with the baseline audit and policy. These should be specific, measurable, achievable, relevant and time-bound with named lead officers.
- 4.1.8. PC24 will analyse the information from performance measurement and use it to identify future improvement targets and to identify particular causes of accident, ill health or poor control of risk, to target for future risk reduction effort.
- 4.1.9. Where evidence comes to light to show that controls have not worked properly, our health and safety rules or procedures have not been followed correctly or our safety standards have not been met, the Health & Safety Group will take action to identify the reasons why performance was substandard and where necessary take proportionate action to avoid any repeats including taking disciplinary action where breaches are considered serious.

4.2. MEASURING PERFORMANCE

- 4.2.1. The Health & Safety Group will determine what (if any) health safety performance measures should be set and will monitor progress of any targets and objectives.
- 4.2.2. The Health & Safety Group will actively monitor performance (i.e. checking) to ensure that our control measures are working properly, our health and safety rules and procedures are being followed and the health and safety standards we have set for ourselves are being met.

- 4.2.3. PC24 will use the information from performance monitoring and audits to review the operation of our safety management system and our safety performance.
- 4.2.4. PC24 will have robust arrangements for reporting and investigating accidents, incidents, near misses and hazardous situations. See [section 6.4](#) below.
- 4.2.5. PC24 will make arrangements to ensure managers continue to check that information, instruction and training has been fully understood by staff and continues to be acted upon.

4.3. AUDITING & REVIEWING PERFORMANCE

- 4.3.1. PC24 will undertake regular audits of our safety management system carried out by competent external auditors or competent auditors employed by our company who are independent of the department they are auditing.
- 4.3.2. PC24's Health & Safety Group will regularly review how well we have met the objectives in our health and safety improvement plan and whether we have met them in the agreed timescales.
- 4.3.3. PC24's Health & Safety Group will formally review our risk assessments annually and as required by certain events i.e. changes in operation, site layout, new purchases, new developments or following an accident or incident on site.
- 4.3.4. PC24 will periodically review its site layout to take account of changes in work activities, traffic type, volume and circulation.

5. LEGAL CONSIDERATIONS

5.1. CORPORATE MANSLAUGHTER AND CORPORATE HOMICIDE ACT 2007

- 5.1.1. The Corporate Manslaughter and Corporate Homicide Act 2007 is a landmark in law. Companies and organisations can be found guilty of corporate manslaughter as a result of serious management failures resulting in a gross breach of a duty of care.
- 5.1.2. One of the key elements required for a defence against a Health & Safety or Corporate Manslaughter prosecution, either criminal or civil, is the adequacy of a health and safety management system, with the policy and underpinning procedural guidance and forms providing the basic framework to deliver a safe working environment. This policy forms the basis of such a system.

5.2. HEALTH AND SAFETY AT WORK ACT 1974 (HSAW)

- 5.2.1. The basis for a health and safety management system is a policy which must be compliant with Section 2(3) of the Health and Safety at Work Act 1974 (HSAW) which requires every employer with five or more employees to produce a written statement of general policy with respect to health and safety, including organisational health and safety responsibilities and arrangements for meeting the policy commitments. See [section 1](#).
- 5.2.2. Unlike other parts of the Act, which are qualified by reasonable practicability, the requirement to produce a policy and communicate it to all staff carries an **absolute** duty. The Health and Safety Group will determine how best to communicate this policy.
- 5.2.3. Health and Safety legislation is criminal law and failure to comply with policies; training or standards could lead to a criminal prosecution of the organisation or an individual.

5.2.4. If found guilty, the result could be:

- In a Magistrates Court – a maximum fine of £20,000 / and or 6 months imprisonment.
- In a Crown Court – an unlimited maximum fine, and / or 2 years imprisonment

5.3. RIDDOR

5.3.1. RIDDOR – Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 puts duties on employers, the self-employed and people in control of work premises (the Responsible Person) to report certain serious workplace accidents, occupational diseases and specified dangerous occurrences (near misses).

5.3.2. RIDDOR requires employers and others to report deaths, certain types of injury, some occupational diseases and dangerous occurrences that ‘arise out of or in connection with work’. Generally, this covers incidents where the work activities, equipment or environment (including how work is carried out, organised or supervised) contributed in some way to the circumstances of the accident. The HSE website provides comprehensive guidance⁵ and the online reporting tool.⁶

5.3.3. PC24’s Quality Governance department are responsible for managing RIDDOR.

6. POLICY PROCEDURES

6.1.1. This section of the policy details key procedures that are relevant to ensure the effective implementation of this policy. This is the main part of the policy and describes the key health and safety aspects relevant to the work of PC24. It details what has to be done in order to comply with the PC24s intent, aims and objectives in relation to health and safety.

⁵ <http://www.hse.gov.uk/riddor/>

⁶ <http://www.hse.gov.uk/riddor/report.htm>

6.2. RISK ASSESSMENTS

6.2.1. The basis for managing health and safety within PC24 is based on the risk assessment process. PC24 accepts that some of its activities, may unless properly controlled, create risks to an employee or contractors (inclusive of expectant mothers, disabled employees and any others who may be affected by our activities). PC24 will ensure that all reasonable steps are taken to ensure risk assessments are completed and control measures are communicated to staff.

6.2.2. As an employer, PC24 is required by law to protect its employees, and others, from harm.⁷ Under the Management of Health and Safety at Work Regulations 1999, the minimum we must do is:

- identify what could cause injury or illness in our business (hazards)
- decide how likely it is that someone could be harmed and how seriously (the risk)
- take action to eliminate the hazard, or if this isn't possible, control the risk

6.2.3. Assessing risk is just one part of the overall process used to control risks in your workplace. Risk management is a step-by-step process for controlling health and safety risks caused by hazards in the workplace. PC24 will nominate and train key staff to undertake risk assessments or appoint a competent person where specialist knowledge and expertise is required in order to:

- Identify hazards
- Assess the risks – identify who might be harmed and how
- Control the risks – evaluate the risk and decide on precautions
- Record findings – review and update as necessary
- Review the controls

6.2.4. **Appendix B** contains PC24's Risk Assessment template.

⁷

<https://www.hse.gov.uk/simple-health-safety/risk/index.htm>

6.3. DYNAMIC RISK ASSESSMENTS

- 6.3.1. Dynamic risk assessment is the practice of mentally observing, assessing and analysing an environment while we work, to identify and remove risk. The process allows individuals to identify a hazard on the spot and make quick decisions in regard to their own safety.
- 6.3.2. While steps can be taken to reduce and eliminate workplace hazards, there are some risks that are unpredictable and difficult to control. For example, an out of hours team encountering an aggressive member of the public, or human error creating a hazard in the workplace – spillage, fire, trips etc.
- 6.3.3. For remote and lone workers operating within irregular environments such as client's homes, a formal risk assessment is unlikely to have been carried out by PC24. Yet when entering unknown environments, particularly behind closed doors, the lone worker could be met with a range of hazards from hostile visitors, animals, trip hazards and even harmful substances.
- 6.3.4. In any of these situations, the ability to carry out a dynamic risk assessment allows the employee to identify a potentially dangerous environment or situation and take the appropriate steps to leave the environment or remove the risk before it causes an accident or incident.
- 6.3.5. It is important to note that dynamic risk assessments should in no way replace risk assessments carried out by the business. Risk assessments are a legal requirement and should be carried out by the employer before employees enter the workplace. If the workplace cannot be risk assessed, the job role still requires a risk assessment.

6.4. ACCIDENT/INCIDENT REPORTING AND INVESTIGATION

- 6.4.1. All personal injuries, accidents and near misses must be reported through PC24's electronic risk management system, Datix.

- 6.4.2. Every year people are killed or injured at work. Over 40 million working days are lost annually through work-related accidents and illnesses. PC24 managers will have regard to the advice afforded by the HSE⁸ when investigating accidents or near misses to find out what went wrong. Learning the lessons and taking action may reduce, or even prevent, accidents in the future.
- 6.4.3. The HSE step-by-step guide will help managers carry out their own health and safety investigations in conjunction with the PC24's incident reporting system and incident management systems. The HSE guidance explains why you need to carry out investigations and takes you through each step of the process:
- Step one: Gathering the information
 - Step two: Analysing the information
 - Step three: Identifying risk control measures
 - Step four: The action plan and its implementation
- 6.4.4. RIDDOR⁹ puts duties on employers, the self-employed and people in control of work premises (the Responsible Person) to report certain serious workplace accidents, occupational diseases and specified dangerous occurrences (near misses).
- 6.4.5. All incidents notifiable to the Health and Safety Executive will be reported in compliance with the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 Act (RIDDOR).
- 6.4.6. HSE¹⁰ provide a list of the types of incidents which must be reported. In brief include:
- Deaths and injuries
 - Specified injuries to workers
 - Accidents resulting in over-seven days incapacitation of a worker

⁸ <https://www.hse.gov.uk/pubns/hsg245.pdf>

⁹ <https://www.hse.gov.uk/riddor/>

¹⁰ <https://www.hse.gov.uk/riddor/reportable-incidents.htm>

- Non-fatal accidents to non-workers (e.g. members of the public)
- Specified occupational diseases
- Dangerous occurrences (near-miss events)
- Gas incidents

6.5. FIRST AID AND FIRST AID ASSESSMENT

- 6.5.1. First Aid facilities within PC24 will meet the requirements of the Health and Safety (First Aid) Regulations 1981. All PC24 premises will have sufficient trained first aiders and supplies in line accordance with the approved code of practise. The names and locations of first aiders will be displayed in a prominent position.
- 6.5.2. Where PC24 premises are occupied by just one or two employees, then subject to the following sections and HSE guidance (see paragraphs, 7, 78, 79),¹¹ if after carrying out a First Aid Needs Assessment, where the Assessor identifies that a designated first-aider is not required, the Manager responsible for the premises will appoint a person to take charge of the first-aid arrangements, including looking after the equipment and facilities, and calling the emergency services when required.
- 6.5.3. Arrangements will be made for an appointed person to be available to undertake these duties at all times when people are at work. Even in small, or low occupied premises occupied by PC24 staff, where first aiders are considered unnecessary, there is always the possibility of an accident or sudden illness.
- 6.5.4. HSE advice¹² states that First Aid provision must be ‘adequate and appropriate’ in the circumstances. This means that Managers must provide sufficient first aid equipment (first aid kit), facilities and personnel at all times.
- 6.5.5. In order to decide what provision is needed, PC24 will undertake a First

¹¹ <https://www.hse.gov.uk/pubns/priced/l74.pdf>

¹² <https://www.hse.gov.uk/firstaid/needs-assessment.htm>

Aid Needs Assessment. This assessment should consider the circumstances of the workplace, workforce and the hazards and risks that may be present. The findings will help Managers decide what first-aid arrangements need to put in place. In assessing your first-aid needs, Managers should consider:

- the nature of the work undertaken
- workplace hazards and risks (including specific hazards requiring special arrangements)
- the nature and size of the PC24 workforce
- the work patterns of PC24 staff
- holiday and other absences of those who will be first aiders and appointed persons
- PC24's history of accidents

6.5.6. Managers will also consider:

- the needs of travelling, remote and lone workers
- the distribution of the PC24 workforce
- the remoteness of any of PC24 sites from emergency medical services
- whether PC24 employees work on shared or multi-occupancy sites
- first-aid provision for non-employees (e.g. members of the public).

6.6. EMERGENCY PROCEDURES AND FIRE SAFETY EVACUATION

6.6.1. The Management of Health and Safety at Work Regulations (1999) cover emergencies. Workplaces need a plan for emergencies¹³ that can have a wider impact. Special procedures are needed for emergencies such as serious injuries, explosion, flood, poisoning, electrocution, fire, release of radioactivity and chemical spills depending on the working environment.

6.6.2. Quick and effective action may help to ease the situation and reduce the

¹³

<https://www.hse.gov.uk/toolbox/managing/emergency.htm>

consequences. However, in emergencies people are more likely to respond reliably if they:

- are well trained and competent
- take part in regular and realistic practice
- have clearly agreed, recorded and rehearsed plans, actions and responsibilities

6.6.3. PC24 will ensure that adequate emergency procedures are in place at its premises with regard to fire, emergency evacuation, etc. and that the procedures are regularly reviewed and tested. Adequate numbers of Fire Marshals to meet the need of emergency procedures will also be assured.

6.6.4. The nominated Fire Officer and Health and Safety Advisor will ensure that a programme of regular fire drills takes place and that all staff are aware of muster locations and procedures.

6.6.5. The Wavertree Headquarters Emergency Evacuation Procedure Standard Operating Procedure (SOP) outlines the roles and responsibilities, fire safety requirements and evacuation procedure for Wavertree Head Office.

6.6.6. Where staff are working from host employer premises it will be the responsibility of the Service Managers / Practice Managers to inform the host employer of any new employees. The Service Manager / Practice Manager will need to provide a local induction for staff.

6.7. MANAGEMENT OF CONTRACTORS

6.7.1. Companies engaging contractors also have health and safety responsibilities,¹⁴ both for the contractors and anyone else that could be affected by their activities. Contractors themselves also have legal health and safety responsibilities. It's important that everyone understands the part they need to play in ensuring health and safety.

¹⁴

<https://www.hse.gov.uk/managing/delivering/do/organising/managing-contractors.htm>

- 6.7.2. The use of contractors does not result in poor health and safety standards, but poor management can lead to injuries, ill health, additional costs and delays. Working closely with the contractor will reduce the risks to PC24 employees and the contractors themselves.
- 6.7.3. Contractors may be at particular risk as they may be strangers to PC24 workplaces and therefore unfamiliar with PC24's procedures, rules, hazards and risks. Even regular contractors may need reminding. The level of control needed will, of course, be proportionate to the complexity of the task.
- 6.7.4. Line Managers will make every effort to identify and utilise competent contractors. No contractor will be accepted to carry out work unless the Business and Finance Team is satisfied that contractor is competent.
- 6.7.5. Where reasonably practicable contractors work will be monitored on an ongoing basis. Details of contractors who fail to carry out their statutory duties will be reported to the Business and Finance Team.
- 6.7.6. Contractors' personnel will be required to identify themselves to the Office Manager on arrival and will display visitors passes at all times.
- 6.7.7. In addition, contractors will be advised on information governance issues as appropriate and will be required to sign a confidentiality agreement before commencing any work for the organisation.
- 6.7.8. All staff will be informed in advance of work which may impact on their duties or have an effect on health and safety arrangements.

6.8. DISPLAY SCREEN EQUIPMENT (DSE)

- 6.8.1. HSE provides guidance on working with display screen equipment (DSE).¹⁵ PC24 has a separate procedure in relation to the implementation of DSE.

¹⁵ <https://www.hse.gov.uk/pubns/indg36.htm>

- 6.8.2. A DSE user can be defined as someone who uses DSE for continuous, or near continuous, spells of an hour or more at a time, and uses DSE in their work more or less daily. If an eye test reveals that the user needs glasses for DSE work, then PC24 will reimburse staff for the costs of the examination and for a pair of basic frames up to the value of £50. If the staff member decides to purchase a pair of glasses above this value, they will only be reimbursed up to this value.
- 6.8.3. There is no evidence to suggest that DSE work will cause permanent damage to eyes or eyesight. Eye tests are provided to ensure users can comfortably see the screen and work effectively without visual fatigue. DSE users are responsible for arranging their own eye tests and will need line manager approval by completing an Eye and Eyesight Examination Reimbursement form.
- 6.8.4. If the glasses are not prescribed solely for DSE use, then PC24 are not legally required to reimburse.
- 6.8.5. Staff can be reimbursed by providing the Business and Finance Team with a completed Eye and Eyesight Examination Reimbursement form which can be found on the staff intranet along with a receipt of purchase. If the optician doesn't tick solely for DSE use, then PC24 will not reimburse.
- 6.8.6. A display screen equipment risk assessment must be completed by each employee who uses this equipment, this must be on an annual basis or sooner where there are changes to working arrangements. These forms can be obtained from the intranet, line manager or the Health & Safety Officer. The completed assessment should then be returned to the individuals Line Manager for further discussion and any actions to be completed.

6.9. EQUIPMENT, MATERIALS AND SUBSTANCES

- 6.9.1. PC24 has a number of oxygen bottles on site; for example, in the buildings where PC24 deliver services from there is currently one 430 litre bottle for emergency use only. PC24 hold a minimum supply of 430 litre bottles at

its HQ building.

- 6.9.2. If oxygen cylinders and equipment are used carelessly or incorrectly, then a fire may result. All users of oxygen should know and understand the dangers and should receive training in the use of oxygen equipment.
- 6.9.3. PC24 will ensure wherever reasonably practicable that equipment, materials and substances used will conform to British or European Standards. A COSHH risk assessment form will be undertaken in line with HSE guidance.¹⁶
- 6.9.4. A Fire Risk Assessment will be carried out.¹⁷ Oxygen cylinders will be handled carefully. The following mitigating activity will be considered:
- A purpose-built trolley to be used to move them from place to place
 - Cylinders will be kept and stored as per manufacturers and Standard Pharmaceutical Committee guidance
 - Oxygen cylinders when not in use will be stored in a well-ventilated storage area or compound ideally in an outside storage area of the building and away from any staff smoking areas
 - Oxygen cylinders will be kept away from combustible materials and separated from cylinders of flammable gas, e.g. propane and butane
 - Limit the number of oxygen cylinders stored to what is absolutely necessary
 - Empty oxygen cylinders will be returned to the supplier as soon as possible
 - Empty oxygen cylinders will be treated with the same caution as you would a full one
- 6.9.5. PC24 will purchase, whenever practicable, the least harmful materials and substances. All equipment will be fit for the purpose for which it is to be used and maintained in accordance with the manufacturer's instructions. All Line Managers are responsible for the monitoring of the use of equipment, reporting any defects or problems immediately to the Service

¹⁶ <https://www.hse.gov.uk/pubns/indg459.htm>

¹⁷ http://www.bcgaco.uk/pages/download_document.cfm?document_name=GN2.pdf

¹⁷ <https://www.gov.uk/workplace-fire-safety-your-responsibilities/fire-risk-assessments>

Manager.

- 6.9.6. All electrical equipment will be subject to regular electrical tests and visual inspections in accordance with the Electricity at Work Regulations 1989 and the advice contained in the HSE publication HS (G) 107 'Maintaining portable and transportable electrical equipment'.¹⁸

6.10. PREMISES

- 6.10.1. PC24 will ensure that premises from which PC24 operate from meet the requirements of the Health and Safety at Work Act 1974 and Workplace (Health & Safety) Regulations 1992.
- 6.10.2. Risk assessments will be undertaken for each building by trained Risk Assessors and these will be reviewed and signed off by the head of service.

6.11. HOMEWORKERS

- 6.11.1. Employers are required to protect the health, safety and welfare of homeworkers who are employees.¹⁹ Where a PC24 employee is permitted to work from home, a risk assessment of the work activities will be undertaken and appropriate measures to reduce any associated risks carried out.
- 6.11.2. PC24 work activities carried out at home is going to be low-risk, office-type work. Of the work equipment used at home, PC24 is only responsible for the equipment supplied.
- 6.11.3. However, employers need to check that any equipment supplied to employees is in good condition and that they have the correct personal protective equipment (PPE) if needed.

¹⁸ <https://www.hse.gov.uk/pubns/books/hsg107.htm>

¹⁹ <https://www.hse.gov.uk/toolbox/workers/home.htm>

6.12. LONE WORKERS

- 6.12.1. PC24 has a separate policy and procedure in relation to Lone Working. However, some overarching policy considerations need to be stated in this PC24 H&S policy.
- 6.12.2. Establishing a healthy and safe working environment for lone workers can be different from organising the health and safety of other employees. They should not be put at more risk than other people working for PC24.²⁰ PC24 does employ clinicians, medical staff and operational staff who work out of hours and they too need to be afforded protection.
- 6.12.3. It will often be safe to work alone. However, the law requires employers to think about and deal with any health and safety risks before people are allowed to do so. Managers undertaking Lone worker risk assessments will have regard to HSE's advice.²¹ Things PC24 will consider to help ensure lone workers are not put at risk include:
- assessing areas of risk including violence, manual handling, the medical suitability of the individual to work alone and whether the workplace itself presents a risk to them
 - requirements for training, levels of experience and how best to monitor and supervise them
 - making sure you know what is happening, including having systems in place to keep in touch with them

6.13. BULLYING AND HARASSMENT IN WORKPLACE

- 6.13.1. PC24 has a separate policy and procedure in relation to Bullying and Harassment in the Workplace, however, some overarching policy considerations need to be stated in this PC24 H&S policy.
- 6.13.2. Any form of harassment and violence against PC24 workers, whether committed by co-workers, managers or third parties, is unacceptable. It breaches ethical standards, as well as affecting the physical and

²⁰ <https://www.hse.gov.uk/toolbox/workers/lone.htm>
²¹ <https://www.hse.gov.uk/pubns/indg73.htm>

psychological health of those affected.

- 6.13.3. Employers have legal duties to protect the health and safety of all their workers,²² so failure to deal with and take reasonable steps to prevent harassment and violence will undermine business performance and could be unlawful.

6.14. MANAGING TELEPHONE VERBAL ABUSE

- 6.14.1. PC24 offers telephone consultation to patients. This consultation may result in a face-to-face consultation or a home visit from one of its clinical or medical staff.
- 6.14.2. It is well established that people who deal with customers and clients by telephone may experience aggression and verbal abuse. The Health and Safety Executive's definition of work-related violence includes verbal abuse and threats as well as physical attacks, and employers have a legal responsibility to reduce the risk of any form of violence to staff.
- 6.14.3. Verbal abuse (and the fear of abuse) can have a serious impact on an employee's mental wellbeing and can lead to distress and anxiety, and longer-term stress-related ill health. For employers, the result can be low staff morale, increased turnover of employees, and recruitment difficulties.
- 6.14.4. HSE cites a number of case studies²³ to show how the risk of telephone verbal abuse can be managed effectively and gives examples of how different organisations have introduced effective preventative measures and provided support after an incident. Managers should have regard to this best practice when developing local policies to protect staff from verbal abuse over the telephone.

6.15. DRIVING

- 6.15.1. Health and safety law applies to work activities on the road in the same

²² <https://www.hse.gov.uk/violence/preventing-workplace-harassment.pdf>
²³ <https://www.hse.gov.uk/violence/verbal-abuse/index.htm>

way as it does to all work activities. Additional road traffic legislation imposes specific requirements on PC24 in respect of vehicle use and maintenance.²⁴

- 6.15.2. PC24 has a separate standard operating procedure in relation to driving PC24 fleet cars and driving for PC24 business.
- 6.15.3. Risk assessment of work-related driving should follow the standard five-step approach for risk assessment. Factors to consider include the distance travelled, driving hours, work schedules, stressful situations and weather conditions.
- 6.15.4. Evaluation of the risks should focus on three things; the driver, the vehicle and the journey.
- 6.15.5. PC24 have specific arrangements to ensure its fleet cars are maintained and inspected in accordance with the manufacturer's recommendations and law.
- 6.15.6. PC24 have arrangements in place to check and monitor driver qualifications and fitness to drive. Drivers of PC24 fleet cars may be required to demonstrate their driving competency and may have to undertake specific driver training.

6.16. STRESS

- 6.16.1. PC24 has a legal duty to protect employees from stress at work by carrying out a risk assessment and acting on it.²⁵
- 6.16.2. PC24 has a separate policy and procedures for managing work related stress, Attendance Management Policy PC24POL38.
- 6.16.3. PC24 acknowledges that pressure is an inherent part of work and that pressure does not necessarily lead to stress because, in many circumstances people are able to cope with the pressure they are under.

²⁴ <https://www.hse.gov.uk/workplacetransport/drivingforwork.htm>
²⁵ <https://www.hse.gov.uk/stress/what-to-do.htm>

However, in some circumstances, people find themselves unable to cope with the pressure that they are under, which leads to a negative reaction; this is stress.

6.16.4. The causes of work-related stress fall under six headings:

- Demands: excessive demands of the job in terms of workload including working hours
- Control: lack of control over work, especially where the work is demanding.
- Support: lack of support in terms of information, instruction and training to do the work and having no one to turn to when pressure increases.
- Relationships: poor quality workplace relationships and, in particular bullying and harassment.
- Role: lack of clarity about an individual's role.
- Change: the threat of change and the change process itself, whether it is a change that affects just one worker or the whole organisation.

6.16.5. A very significant cause that does not appear in the list above is non-work-related factors, for example, bereavement, separation and family illness. PC24 recognise that although these factors are not work-related, they still have effects in the workplace and provide. PC24 provide a confidential counselling service for employees; this service can be useful to employees in dealing with both work-related and non-work-related matters.

6.17. SUBSTANCE MISUSE

6.17.1. PC24 has a legal duty to protect employees' health, safety and welfare. Understanding the signs of drug and alcohol misuse (or abuse) will help manage health and safety risk in the workplace.²⁶

6.17.2. PC24 has a separate policy and procedure in relation to substance misuse. However, some overarching policy considerations need to be

²⁶

<https://www.hse.gov.uk/alcoholdrugs/>

stated in this PC24 H&S policy.

- 6.17.3. Drugs and alcohol misuse can have serious health and safety consequences in the workplace, both for the worker, others involved in any incident and the employer.
- 6.17.4. Drugs and alcohol misuse must be controlled by the employer through clear policy, support for affected workers and awareness campaigns.
- 6.17.5. Notable examples of the types of substances that may be misused at work include, alcohol, legal or illegal drugs and solvents.
- 6.17.6. Alcohol is an addictive narcotic drug that significantly impairs the sense and reaction times, even at low doses. Social history has meant that it is widely available, used and misused.
- 6.17.7. 'Drugs' is a very broad term that can be applied to non-prescription and prescription drugs, such as painkillers and controlled drugs and illegal drugs such as cocaine.
- 6.17.8. The effects of alcohol and drug misuse will vary, but some general symptoms might be observed, such as, late attendance, increased absences, reduction in the quality of work, dishonesty, theft, irritability and mood swings and deterioration in working relationships
- 6.17.9. Drugs and alcohol cause sensory impairment, skewed perceptions, impairment to motor control and, in many cases, fatigue and drowsiness. There are obvious risks associated with drugs and alcohol, e.g. driving a vehicle or operating machinery under the influence increases the risk to the worker and to others, and critical decisions should not be made with impaired judgement. There is also health risks for the workers, usually associated with long-term abuse, e.g. cirrhosis of the liver, due to alcohol abuse.
- 6.17.10. PC24 have established a clear, Alcohol and Substance Misuse Policy, PC24POL48 as well as access to a counselling service.

APPENDIX A – HEALTH & SAFETY GROUP TERMS OF REFERENCE

Unique Identifier:	Review Date: April 2021		
Issue Status: V2.0	Issue No: 1	Issue Date: 16.07.2020	
Authorised by: PC24 Leadership Team		Authorisation Date:	
After this document is withdrawn from use it must be kept in an archive in accordance with Information Governance guidelines			
Archive: Document Control		Date added to Archive: 23.01.20	
Officer responsible for archive: Author			

1. Authority

The Health & Safety meeting will take place quarterly, escalating as required any concerns to Primary Care 24 (PC24) Leadership Team. It will report in to the PC24 Quality Governance Group on a quarterly basis, which in turn will report in to the Quality and Workforce Committee providing assurance to PC24 Board. The action points shall be formally recorded by the Director of Nursing and Quality's Executive Assistant and submitted to the Quality Governance Group along with a highlight report as required. The Chair shall draw attention to any matters relevant for action, for example matters reportable to regulators or insurers.

The Health & Safety meeting is authorised by the Quality and Workforce Committee to seek any information it requires from any employee, and all employees are directed to co-operate with any request made by the Group.

2. Purpose

The role of the group is to ensure the health, safety, security and welfare of all the employees of PC24, service users, visitors and any others who may be affected by PC24's activities.

The purpose of the group is to monitor outcomes of incident reviews, national enquiries, external inspections, alongside risk management and the monitoring and implementation of any recommendations and/or 'lessons learnt' for the organisation. Subsequent discussion and analysis of information provided will occur during the meeting. This information, and the analysis thereof, may subsequently be reported to the Board of PC24.

3. Duties

The Group will deliver the following objectives, along with any others that are assigned by the Committees or the Board of PC24 during the course of the year:

- To lead the development and implementation of a Health & Safety Improvement Plan.
- To oversee and monitor the implementation of this Improvement Plan.
- To provide expert advice to the organisation regarding all aspects of Health & Safety, including national policy initiatives, ensuring that the implementation of those national policies that require action locally are successfully implemented and that relevant stakeholders are involved or informed as appropriate.
- To receive and monitor SDU Health & Safety Assurance Reports.
- To develop, review and endorse Health & Safety policies and procedures.
- To promote, facilitate and monitor training and education of PC24 staff in relation to Health & Safety.
- To assist in promoting a safer culture within PC24.
- To improve systems for safer care throughout the organisation and reduce harm to service Users and staff.

4. Equality and Diversity

The Group will have regard for the NHS Constitution and ensure that it complies with relevant legislation and best practice in the conduct of its duties

5. Membership

Core Team will consist of Clinical Governance and Operational staff:

- Director of Nursing (Chair)
- Health, Safety & Governance Officer (Deputy Chair)
- Deputy Director of Primary Care
- Deputy Director of Operations
- Training Manager
- Office Manger
- Clinical Audit & Effectiveness Lead
- HR Manager
- Staff representatives : Nominated named H&S lead for each SDU i.e. Practice Manager and Service Manager

Attendees (as required):

- Other Executive Directors
- Service Managers

- Medicines Management Team representative
- Members of Nursing and Quality Team
- For developmental purposes other staff members may attend the meeting having had agreement from the chair person.

6. Attendance

If a member fails to attend two consecutive meetings the Chair of the Group will contact the individual. The Chair of the Group will also be required to bring to the attention of the relevant Director if they feel that lack of attendance has not enabled adequate discussion or decision making.

7. Quorum and Frequency

A quorum consists of at least 4 core team members (including SDU representation) and is required for any meeting to be quorate; this number must include either the Director of Nursing (Chair) or a nominated deputy; Deputy Directors or nominated deputy; and a member of the training team.

Meetings will be held quarterly.

Members of the Group unable to attend a meeting may request a deputy to attend on their behalf with the prior agreement of the Chair of the Group. The Group shall meet quarterly.

8. Requirements of Membership and Quoracy

All members will undertake work requested by the Group within the identified timescales. It is essential that all members participate in the meetings and punctuality must be observed.

All members must feedback issues raised within the meeting to their areas of responsibility, as appropriate.

The Chair will ensure that key issues identified are highlighted as appropriate to the relevant Committee and/or lead Executive Director as required.

Should a Head of Service from an individual SDU be unable to attend the meeting, they shall nominate a suitable deputy in their absence.

8. Reporting

Any risk scored at >15 will be added to Corporate register by the Health & Safety Officer and considered by Executives for inclusion at Board.

Each service area will maintain and review a Health & Safety risk register as part of their SDU risk register.

Services responsible to ensuring H&S incidents are reported on the Datix risk management system

On a quarterly basis risks with an associated list of recommendations/action plan will be presented to the Health & Safety group by SDU representative.

Individual written reports and papers may be requested on occasion.

SDU representatives to channel communications/actions/feedback to their teams.

10. Administration of Meetings

The Group will meet weekly with a minimum of 4 meetings per year. The duration of each meeting shall be approximately 1 hour.

The Director of Nursing will make arrangements to ensure that the Group is supported administratively. Duties in this respect will include taking action notes of the meeting and collating the relevant papers including updating the action log and circulating the same prior to the meeting.

An annual meeting schedule along with an appropriate venue will be the responsibility of the Executive Assistant administering the meeting and should be shared with members at least 6 months in advance.

11. Review

The Terms of Reference shall be reviewed at least annually.

The Group will review its effectiveness annually.

ANNEX 1 – HEALTH AND SAFETY GROUP STANDARD AGENDA

DATE: TBC

TIME: TBC

VENUE: TBC

Item	Presented by
1. Welcome and Apologies	Chair
2. Actions from last meeting	Chair
3. Training	NG
4. Policies and SOPS	H&S Officer
5. Service Managers updates and feedback <ul style="list-style-type: none"> • Emergency Procedures & Fire Safety • Environmental Inspections /Checks • Site Risk Assessments • Covid-19 Secure Risk Assessment • DSE on induction / DSE Home Workers • Oxygen Storage • Electrical Testing/PAT Testing • Lone Workers/Panic Alarms • Changes in the workplace 	All
6. H&S Risk Register	H&S Officer
7. H&S Performance & Monitoring	H&S Officer
8. Incidents update	All
9. AOB	All
10. Date and time of next meeting	

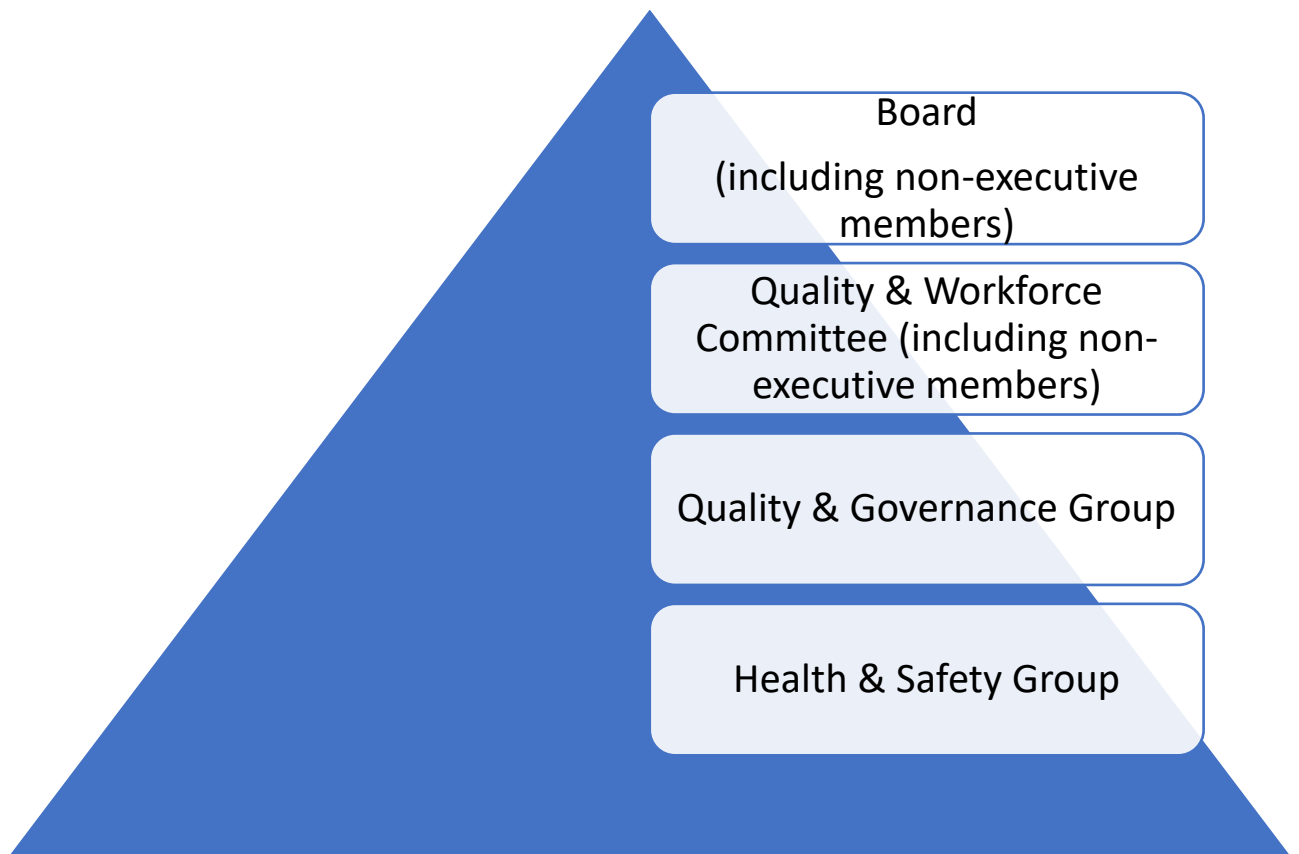
APPENDIX B – RISK ASSESSMENT TEMPLATE

Name of Site		Manager	
Service Area		Name and job role of person(s) completing risk assessment	
Date		Review Date	

All employees of PC24 are responsible for reporting to management any additional unforeseen hazards not listed in this document. The Health & Safety management will risk assess the observations and the appropriate action must be taken to protect their own safety and all other people affected by the hazard. Any employee must escalate any hazards identified as soon as possible to their line manager as well as reporting the incident on Datix.

What are the Hazards/threats	Who might be harmed and how	What are you already doing to control the risks?	What further action do you need to take to control the risks?	By whom	By when	Done

APPENDIX C – PC24 HEALTH & SAFETY GROUP REPORTING STRUCTURE



APPENDIX D – HEALTH AND SAFETY TRAINING NEEDS ANALYSIS

Training Programme	Course Length	Frequency	Delivery Method	Staff Group	Recording Attendance	Strategic & Operational Responsibility
NEBOSH General Certificate	2 weeks	5 yearly	Classroom	H&S Officer	Training Department database	Director of Nursing
Health & Safety Mandatory Training	Minimum 1 hour	3 yearly	e-learning	All	Training Department database	Director of Nursing
Root Cause Analysis Training	1 day	Once only	Classroom, followed by mentorship, supervision	Senior staff who have a responsibility to carry out investigations for moderate/severe incidents	Training Department database	Director of Nursing
Datix, & Risk Awareness, Reporting, Escalation, Risk Assessment	3 hours	Once only	Classroom	All	Training Department database	Director of Nursing
Health & Safety: Policy, Risk Assessment	Half day	Once only	Classroom	All managers	Training Department database	Director of Nursing