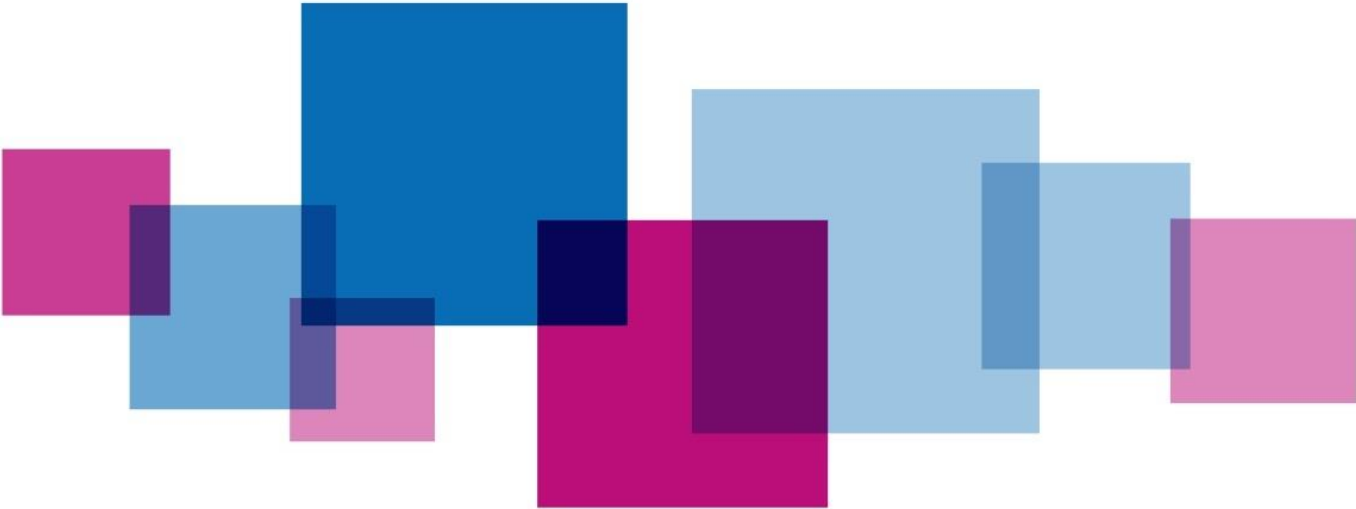# Health and Safety Management Policy

Please complete the table below: To be added by corporate team once policy approved and before placing on website	
Policy ref no:	43
Responsible Executive Director:	Sarah Truelove, Deputy Chief Executive and Chief Financial Officer
Author and Job Title:	Rob Hayday, Associate Director of Corporate Services
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Approved by:	Governing Body
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Version Control please remove this box once approved and finalised		
Version	Date	Consultation
1- Draft	16th May 2018	Produced by Lyn Harvey (LH). To Jeanette George (JG)
2 -	16th May 2018	Amendments made by JG. To Graham Wilson (GW) and LH for comment
2.1	17th May 2018	Incorporates comments and amends from GW.
2.2	21st May 2018	Incorporates additions from LH as agreed with GW
3	12 July 2019	Includes additions made by RH and validated by LH
4	26 July 2019	Updates required by Governing Body including clarification of occasional home working and driving while use of mobile phones
5	6 September 2019	Chnages made as discussed at the September Governing Body meeting

Contents

Bristol, North Somerset and South Gloucestershire CCG
Health and Safety Policy

1. Introduction

This policy describes the organisations commitment to ensuring the health, safety and welfare of our employees and of other persons who may be affected by our activities. The policy has been prepared in acknowledgement of the organisation's moral and legal obligations under the Health and Safety at Work etc. Act 1974 and subsequent legislation and describes the arrangements in place and responsibilities of managers and employees at all levels within the Bristol, North Somerset and South Gloucestershire NHS Clinical Commissioning Group (BNSSG CCG)

2. General Health and Safety Policy Statement

The CCG will take steps to ensure that our statutory duties are met at all times and commit to continual improvement and periodic review should the law change or this policy becomes out of date. The organisation recognises and accepts its responsibilities as an employer to provide a safe and healthy work place and the wider working environment for all its employees. The organisation's Governing Body will provide the leadership to ensure that exemplary health and safety practices are firmly embedded throughout the organisation to provide a secure and healthy environment in which to work.

The CCG has set out full details of how we organise and manage health and safety in this policy and in additional separate policies and guidelines. The Governing Body will establish and maintain appropriate systems to meet the requirements under the Duties and Responsibilities section of this policy and appoint competent persons to assist the CCG in meeting its statutory duties. This, and any associated policy will be made available to all staff.

The CCG will establish a proactive system of risk management for identifying, assessing and managing risks. Health and safety risk assessments will be undertaken by competent staff in connection with our premises and activities to ensure that appropriate measures are taken to eliminate or reduce any identified hazards. We will ensure that all processes and systems of work are designed to take account of health and safety, are properly supervised at all times and provide employees with health surveillance where this is appropriate

The CCG will ensure every employee is given the necessary information, instruction and training to be able to work safely. The successful implementation of this policy requires total commitment from all employees. Every employee is required to co-operate to enable all statutory duties to be complied with. Each individual has a legal obligation to take reasonable care for his or her own health and safety and for that of other people who may be affected by what they do, or fail to do

The CCG will have appropriate arrangements for dealing with serious and imminent danger including fire conditions and will work with the landlords and other building stakeholders to implement the necessary arrangements.

The CCG will co-operate and co-ordinate with other employers to ensure effective mutual health and safety arrangements

3. Purpose and Scope

The purpose of this policy is to clearly describe how the CCG will, as far as reasonably practicable, ensure the health, safety and welfare of its employees and others for which it holds a legal responsibility or who are affected by the organisations actions.

The operation of a safe working environment places significant responsibilities on both managers and individual employees. This includes identifying and implementing safe systems of work where required as well as the development of supporting policies. The CCG expects all staff to act responsibly, with common sense and not to abuse the facility or trust put in them. This policy and any arrangements made under it apply to the following:

- All members of staff directly employed by the CCG and for whom the organisation has legal responsibility
- For those staff covered by a letter of authority/honorary contract or volunteers, the organisations policies are also applicable whilst undertaking duties for or on behalf of the CCG
- Third parties acting on behalf of the CCG (Including commissioning support and shared services)
- Agency, locum, interims and other temporary staff engaged by the CCG
- Students, including those on work experience, trainees and apprentices
- Visitors and members of the public

4. Duties and Responsibilities

4.1 Organisational Accountability

The CCG is fully committed to protecting the health, safety and welfare of its entire staff and others that may be affected by its' work. The Governing Body of the BNSSG CCG will provide the leadership to ensure that exemplary health and safety practices are firmly embedded throughout the organisation to provide a secure and healthy environment in which to work

4.2 Chief Executive

The Chief Executive has overall responsibility for ensuring that the CCG complies with the Health and Safety at Work Act 1974 etc, the Management of Health and Safety at Work Regulations 1999 and all other relevant legislation.

The Chief Executive is also responsible for:
- Ensuring that adequate resources are available to implement the Health and Safety Policy

– Ensuring that health and safety performance is regularly reviewed at Governing Body level

4.3 Executive Lead for Health and Safety

The Chief Executive has delegated responsibility for the implementation throughout the organisation of suitable arrangements to ensure the health, safety and welfare of all employees at work and the health and safety of other persons who may be affected by their activities to the Deputy Chief Executive (who is also the CCGs Chief Finance Officer). Their responsibilities include:

– Ensuring a suitable forum is established to discuss health and safety matters
– Ensuring reports regarding health and safety are prepared and regularly presented to the Governing Body
– Reporting incidents to the Enforcing Authority as required by legislation (see section 6)
– Setting a framework for strategic planning and management of health and safety to ensure the CCG complies with current and future legislation
– Ensuring this Health and Safety Policy is reviewed annually or more often if required to remain effective
– Ensuring that there are clearly defined responsibilities and arrangements for implementation of this policy and that there are arrangements for the monitoring its implementation and effectiveness
– The BNSSG CCG Governing Body members and managers are provided with competent health, safety and welfare advice to assist with the provision of protective and preventive measures and the implementation of health and safety legislation
– Establishing and maintaining arrangements for consulting with trades unions' or employees' safety representatives
– Ensuring the effective coordination of health, safety and welfare to ensure implementation of the policy is consistent
– Ensuring the safety of third parties such as contractors, agency workers, visitors and members of the public is not compromised by lack of communication of risk and control measures
– Ensuring that Health and Safety audits are implemented to promote progressive development of health and safety standards across the organisation
– Ensuring that effective emergency plans are in place for instances of serious and imminent danger and that all staff are aware of their responsibilities
– Ensuring provision of adequate resources and training arrangements, including inductions to enable staff to discharge their health and safety responsibilities and ensure that all policy objectives and legal requirements are met as so far as is reasonably practicable
– Ensuring that significant health and safety issues that cannot be resolved are raised with the Chief Executive

4.4 Senior Managers

Duties of Senior Managers include:
– Supporting the Executive Lead for Health and Safety with the implementation throughout the organisation of suitable arrangements to ensure the health, safety and

welfare of all employees at work and the health and safety of other persons who may be affected by their activities.

– Doing all that is reasonably practicable to establish and maintain high standards of health, safety and welfare in their areas of control, ensuring that this policy is implemented and that appropriate responsibilities for health and safety are detailed in agreed job descriptions.

– Ensuring that risk management is given appropriate emphasis and that there is sufficient communication on risk management matters to enable reasoned decisions to be made and priorities set

– Giving prompt and appropriate attention to matters of safety brought to their attention and resolving these as so far as is reasonably practicable, taking advice where necessary and where these matters cannot be resolved at Senior Management level reporting these to the Executive Lead for Health and Safety.

4.5 Line Managers Duties

Line Managers are responsible for:

– ensuring their staff receive all necessary health and safety training, instruction and information and that such activities are properly recorded and records maintained

– Completing building orientation and inductions and ensuring individuals are familiar with health and safety arrangements

– ensuring that all significant local hazards have been identified and risk assessed

– Communicating to staff essential health and safety information arising from the risk assessment process and promote a culture where staff can communicate health and safety issues without conflict or prejudice

– Monitoring that risk controls have been implemented and are working satisfactorily. This can be done proactively by observing specific procedures or more generally by workplace inspection and by considering reports of incidents, near misses and accidents

– Ensuring that where controls fail resulting in near misses or accidents, that these are promptly reported on the incident recording system and that any remedial activities are identified and implemented

– Ensuring that all significant incidents receive investigation into root causes to avoid similar recurrence

– Ensuring all staff are aware of health and safety procedures; and

– Encouraging the good behaviour required by staff by setting a good example with respect to health and safety.

– Giving prompt and appropriate attention to matters brought to their attention by safety groups, safety representative or their own employees

– Monitoring and evaluating the health and safety performance in areas under their control, paying particular attention to safety inspections, training, accident statistics and action plans

– Ensuring proactive and reactive reporting to the Executive Lead for Health and Safety of compliance issues, incidents and any accident investigations undertaken

– Ensuring adequate communication is provided to third parties such as contractors, agency workers, visitors and members of the public

– In conjunction with the Occupational Health service, ensuring that appropriate health surveillance is carried out where necessary

– Monitoring and evaluating the health and safety performance in areas under their control

4.6 All Staff

All CCG employees have legal duties and responsibilities for health and safety as set out in the Health and Safety at Work Act 1974 and other associated legislation.

Staff must:
– Take reasonable care of their own safety and that of others who may be affected by their actions or omissions
– Cooperate with line managers on health and safety issues to enable the CCG to carry out its statutory obligations
– Report any work situation that would reasonably represent a serious and immediate danger to health and safety or a shortcoming in the employers protection arrangements
– Perform their work, including using any equipment, substances and safety devices, according to information and training that they have received
– Make full and proper use of any control measures or systems of work provided for their use
– Ensure that they are fully aware of all health and safety policies and procedures and understand what actions are required
– Complete any identified training
– Report to their line manager and not attend work if they are unwell with an infectious illness/disease.
– Not interfere with or misuse anything provided in accordance with the legal duties
– Undertake dynamic risk assessment of their environment including in regard to their use of display screen equipment (DSE) to support the CCG's flexible use of workspace.
– Maintaining modes of transport used for business purposes in an appropriate manner and having any necessary insurance cover.
– Providing evidence of compliance with policy requirements to support the organisation discharge its health and safety responsibilities and ensuring such information is up to date.
– Remove identity badges when outside work premises and travelling in vehicles.

4.7 The Governing Body

Each Governing Body member has a role in providing health and safety leadership in the organisation with personal responsibilities and liabilities under health and safety law.

The Governing Body will:
– Ensure that all its decisions reflect its health and safety intentions as laid down in the health and safety policy statement
– Ensure that the health and safety policy statement reflects current organisational priorities and is kept under review.
– Recognise its role in engaging the active participation of staff to improve health and safety standards within the organisation
– Ensure that there are effective management systems for monitoring and reporting on health and safety performance
– Consider reports on significant health and safety issues and investigations

4.8 Health and Safety Advice

The CCG has secured the provision of a suitably qualified and competent person to enable the organisation to comply with its legal requirements. Agreed duties of this role include:

– Providing competent advice on health and safety management to the organisation at which shall include reporting to the Executive Lead for Health and Safety when required.
– Assisting in the development, monitoring and review of this Health and Safety Policy
– Advise on risk assessments and the development of risk control strategies relating to the CCG's employees
– Provide advice and support in response to health and safety related incidents reported through the incident reporting system, such incidents being managed and maintained by CCG.
– Provide advice and support in relation to reports on health and safety related incidents and, where appropriate, provide advice on the identification of actions taken in response to the incidents at agreed intervals.
– Provide advice and guidance on the requirement to report incidents under 'The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013' (RIDDOR). The CCG remains legally responsible for reporting incidents under RIDDOR to the enforcing body
– Assist the CCG in the preparation of a Health and Safety Annual Report
– Assist with provision of risk assessor training

4.9 Occupational Health Services and Employee Assistance Programme

The CCG has secured and will maintain an Occupational Health Service that will work in partnership with the organisation to preserve and enhance the health and welfare of staff and advise on matters relating to the health of employees at work. The CCG also provides an Employee Assistance Programme. This is a dedicated service designed to support your health and wellbeing

4.10　　　Facilities and Estates

NHS Property Services (NHSPS), the Landlord at South Plaza is responsible for the provision of a suitably qualified and competent person to provide for the activities of estates, developments, facilities and support services in respect of the specific Health and Safety requirements involving buildings, refurbishments, developments, facilities, chemical substance disposal, waste disposals and the employment of contractors, method statements for works etc as set out in the CCG lease (Lease yet to be developed by NHSPS). Through the management of a regular forum of South Plaza Building occupiers, NHSPS will also co-ordinate safe and effective building arrangements alongside the landlord/premises owner.

Staff based in other premises operate under the provisions for health and safety set by the landlord of those premises. However, their responsibilities for health and safety are covered by this policy.

5. Risk Assessment

Risk assessments will be undertaken as required by persons appointed as Risk Assessors. These individuals will have received the necessary training to provide an awareness of legislative requirements, knowledge of templates, skills and practical experience to undertake

risk assessments on behalf of the CCG. Nominated Risk Assessors will be appointed within each CCG location, including South Plaza and the Area Offices.

The role of Risk Assessors will include:
- Undertaking appropriate risk assessment training;
- Carrying out comprehensive risk assessments of environment, new tasks, procedures, equipment and personnel, in consultation with staff and ensure that these are reviewed as necessary;
- Ensuring that risk assessments are recorded and kept centrally which are fully accessible to staff;
- Informing managers of information that needs to be communicated to staff about the significant outcomes of risk assessment, including;
  o The risks to their health and safety identified by the assessment;
  o How harm occurs;
  o The preventative and protective measures;
  o Safe working practices
- Reviewing existing risk assessments within identified timeframes or in the event of an accident, ill-health situation, change to a procedure, equipment or staff responsibilities.
- Producing necessary safe systems of work arising from the assessment. These should clearly state the hazards and risk factors and incorporate a description of the health and safety control

5.1 Incident / Near Miss Reporting

The CCG will ensure that any injury, disease or dangerous occurrence that falls within the categories outlined in 'The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013' (RIDDOR) is reported within the timescales set out in the regulations. Details about reportable incidents and how to submit reports may be found at the Health and Safety Executive website http://www.hse.gov.uk/riddor/

Reportable incidents include:
- Work-related accidents which cause death
- Work-related accidents which cause certain serious reportable injuries
- Diagnosed cases of Occupational diseases
- Certain Dangerous occurrences (incidents or near misses with potential to cause harm)

For all the above categories, a report must be received by the Health and Safety Executive within 10 days of the incident. Reporting to the enforcing authority will be via **the Executive Lead for Health and Safety.**

Over-seven-day incapacitation of a worker:
These are accidents resulting in an employee or self-employed person being away from work or being unable to perform their normal range of work duties for more than seven consecutive days as the result of their injury. This period does not include the day of the incident but does include weekends and rest days**. In this situation the report must be made within 15 days of the incident.**

Injuries to non-workers/visitors:
Work-related accidents involving members of the public or people who are not at work must be reported if a person is injured, and is taken from the scene of the accident to hospital for treatment to that injury. There is no requirement to establish what hospital treatment was actually provided, and no need to report incidents where people are taken to hospital purely as a precaution when no injury is apparent

Aside from the RIDDOR reporting responsibilities, the CCG will implement a system for reporting incidents/near misses which will be accessible to all staff.

6. General Safety of the Work Environment

6.1 Multiple CCG Office Locations

As an employer, the CCG will ensure, so far as is reasonably practicable, that the working environment is a safe and healthy one. Provisions will be made in order to comply with the Workplace (Health, Safety and Welfare) Regulations 1992. This will include consideration within all office locations of:

- Heating
- Lighting
- Ventilation
- Cleanliness
- Floors and traffic routes
- Room dimensions and space
- Workstations and seating
- Sanitary conveniences and washing facilities
- Drinking water
- Facilities for rest and to eat meals

Control measures will be in place to ensure walkways are free from obstruction and trip hazards at all times. Arrangements will be in place to deal with ice and snow in external pedestrian access points. Service agreements will be in place to ensure utilities are fully maintained and any maintenance work required will only be carried out by qualified professionals

6.2 Working in premises where CCG staff are not routinely based

The CCG has a responsibility to its staff wherever they work. For staff working in premises where they are not based it is important that arrangements for Health & Safety of the site are clear to all. This will include fire safety and emergency evacuation arrangements. Information about who to contact about site management risks should be available to all staff on the premises and included on the Health & Safety Noticeboard.

Training, supervision and information will be given to staff by competent people and will form part of the statutory/mandatory training programme and employee inductions.

6.3 Home Working

All CCG staff have nominated bases in offices where the CCG rents space from a landlord or has a licence to occupy. No staff have their defined bases set as their home. However, the

CCG permits staff to work from home in agreement with line management. Such work is carried out from home, typically on an ad hoc basis, to do a particular piece of work. The employee would retain an office workstation at their normal place of work or other desk sharing arrangement dependent on local team arrangements

There is no employee right to work at home. Where a particular piece of work is identified to be compatible with a home working arrangement, this will be considered on the individual merits of the request. Any occasional home working arrangement must primarily meet the business needs of the service and must not be used to deal with absence from work for reasons such as sickness or emergency leave.

Employees must comply with all CCG policies, practices and instructions in relation to Information Governance whilst working remotely or at home.
Health and safety regulations applying to staff in the conventional workplace also apply to those working remotely. To support the CCG in discharging its Health and Safety responsibilities and duty of care to individual staff members, each employee who is permitted to work from home is required to complete a risk assessment of their domestic setting – for which the individual is responsible – to indicate that the premises is suitable for working from home. Risk assessments will be update annually or sooner for example, in the event that an individual moves house.

7.   Fire Safety and Other Emergency Situations

7.1 Fire Safety
The CCG will ensure that all persons on all of its controlled sites are able to proceed safely along a recognised escape route, to a place of safety regardless of the location of the fire;
  – Risk assessment will be carried out to ensure that, as far as is reasonably practicable, all fire hazards and/or risks are eliminated;
  – Fire Wardens will be appointed at all of the CCG controlled sites to assist with evacuation procedures;
  – Assembly points will be clearly identifiable and located in a suitable place away from any other dangers; and
  – Staff will be fully informed and trained via test evacuations in local evacuation procedures and will receive suitable refresher training as appropriate.

7.2 Other emergency evacuations:
Emergency evacuations prompted by bomb threats or other events will have the same essential principles for fire evacuation, although may not be signalled by an audible alarm, but via fire wardens as one or more escape routes could be impacted by any suspicious device or gas leak for example. Specific instructions will be issued to staff as the need arises and staff should read the appropriate evacuation process for any sites that they attend.

Training, supervision and information will be given to staff by competent people and will form part of the statutory/mandatory training programme.

7.3 Evacuation of persons with disabilities or reduced mobility:

Personal Emergency Evacuation Plans (PEEPs) should be completed by all line managers with their staff to ensure the safe evacuation of persons with disabilities or reduced mobility in the event of a fire or other emergency, and to ensure that their evacuation does not impede the evacuation of other persons. These plans must be shared with all Fire Wardens and a copy should be retained on the fire wardens check list. Hosts of visitors with disabilities or reduced mobility must take responsibility for the safe evacuation of their visitors and be aware of specific needs of individuals visiting.

7.4 Lockdown of Office Bases

Lockdown is a security management measure to reduce potential harm to staff and visitors arising from hostile threats directed at our administrative bases and its occupants. These measures are in place due to national threat levels and to support effective security management in the NHS.

The NHS is mindful of the growing terrorist threats reported nationally and other potential security threats to staff and is committed to implementing proportionate measures to mitigate such risks.

The following are threats considered to warrant the use of these lockdown arrangements:

•   Targeted verbal/ physical attack on any member of staff on site including those in other organisations
•   Marauding terrorist attack on the premises
•   Threats to staff/ visitors using weapons
•   Contamination risks on the premises or off site with the potential for public to access premises if this incident arises

The landlords for our administrative sites hold a lockdown protocol and there is a key dependency on their input to secure premises.

8.   Display Screen Equipment (DSE)

All staff that regularly use display screen equipment as a significant part of their normal work (daily, for continuous periods of an hour or more) are classed as "essential DSE Users" under the Health and Safety (Display Screen Equipment) Regulations 1992. The CCG will comply with these regulations by:

– Identifying all Display Screen Equipment (DSE) Users – individuals who use DSE for a significant part of their working day
– Ensuring all DSE Users complete a DSE Workstation Self-Assessment annually as part of mandatory training with results shared with their Line Manager
– Ensuring all DSE Users complete a new DSE Workstation Assessment if there is a change to their workstation, if they are experiencing discomfort that may be affected by or attributable to their workstation or if they have a new health condition that may be affected by, or attributable to, DSE work
– Ensuring staff are informed about maintaining good posture and good practice when working with DSE
– Facilitating a specialist DSE assessment where advised by Occupational Health on commencement of employment

– Putting in place reasonable measures to address issues of comfort or safety identified by the DSE Workstation Assessment
– Referring DSE Users to Occupational Health for advice and guidance on managing new or existing conditions that may be affected by or attributable to DSE Work at the earliest opportunity
– Paying for regular eye and eyesight tests for DSE Users where requested and authorised by a Manager
– Paying for spectacles (to an agreed amount) for specific use with DSE where they are deemed a requirement for safety by an optician
– Providing laptop users with a separate keyboard, mouse and docking station
– Ensuring individuals who are required to work from home complete a DSE Workstation Self-Assessment for home and that reasonable measures are put in place to address issues of comfort or safety identified by the assessment.

9. Driving at Work

9.1 Managing Risks of Driving at Work

The CCG will manage the risks of driving at work by:
– Identifying all staff who are potential 'drivers at work' ie individuals who drive to other sites, events or meetings as part of their working day.
– Checking the individuals MOT, business mileage insurance and driving licence on commencement of employment and on at least an annual basis thereafter. Staff will be expected to take responsibility for having these arrangements in place and certifying as such on their mileage claims.
– Ensuring all drivers at work have provided personal details including car details (make, model, registration), alternative contact telephone numbers, next of kin name and contact and that this information is updated when there is a change
– Requiring individuals to notify their line manager of any change to licence, insurance or MOT at the earliest opportunity
– Requiring individuals to notify their line manager of any new or existing health condition or medication that may affect their ability to drive for work
– Enabling staff to drive safely, comply with legislation and the Highway Code by providing adequate time for travel, ensuring staff have the opportunity for regular breaks during the day and on long journeys

The Highway Code states in Rule 149 that:
You MUST exercise proper control of your vehicle at all times. You MUST NOT use a hand-held mobile phone, or similar device, when driving or when supervising a learner driver, except to call 999 or 112 in a genuine emergency when it is unsafe or impractical to stop. Never use a hand-held microphone when driving. Using hands-free equipment is also likely to distract your attention from the road. It is far safer not to use any telephone while you are driving or riding - find a safe place to stop first or use the voicemail facility and listen to messages later.

Staff are required to abide by The Highway Code and exercise caution when driving.

9.2 Use of Mobile Phones

Employees that use mobile phones at work are required to operate them safely and without risk to themselves or others. It is a criminal offence for anyone to drive a motor vehicle while using a hand-held telephone or a similar device which performs an interactive communication function by transmitting and receiving data.

The definition of driving within the Highway Code includes situations where the vehicle is stationary but the engine is still running. In order to avoid committing an offence a driver will need to have parked and switched the engine off before using a hand-held phone.

It is also an offence for anyone to cause or permit' someone else to use a hand-held phone whilst driving. Managers, therefore, must neither ask nor expect their staff to use their mobile phones whilst driving. It does not mean that they cannot provide their staff with phones or unknowingly call staff whilst they are driving, but they should not expect them to answer.

Hands-free kits for mobile phones are legal to use, however, a telephone conversation using hands-free is a significant distraction, as evidenced by research undertaken by Royal Society for the Prevention of Accidents (ROSPA) and staff must exercise caution when determining whether to make use of a hands-free kit.

Drivers should note that if the police think you are distracted and not in control of your vehicle you could still get stopped and be penalised.

Staff are not expected to make any business calls (including dialling into meetings) while driving; they should consider their own safety and that of others as a first priority and act in accordance with the Highway Code at all time
Mobile phones must not be used in any situation where their use is locally prohibited or where they may cause risk.

9.3 Satellite Navigation Equipment

Any visual distraction can compromise safety whilst driving. However, Satellite Navigation is recognised as a useful aid, especially for drivers visiting a new area for business purposes. Employees must ensure, however, that they exercise caution if operating any navigation system whilst driving as this may cause a distraction.

10. Cycling for Work

The CCG recognises that staff may use bicycles for transport for work. Staff using this mode of transport as part of their business are encouraged to take the following steps to reduce associated hazards:
- Ensure cycles are suitable for use and in a road worthy condition
- Wear cycle helmets
- Wear clothing which makes them visible to other road users

11. Lone Working

The CCG will avoid the need for employees to work alone where reasonably practicable although it is accepted that this may be required on occasion.

Offices are mainly of an open plan format in shared premises and although CCG staff may not be alone in the building due to the size and number of other tenants, they may still be isolated to an extent and are advised if in this situation to follow a buddy system or other similar procedure when leaving.

Lone working risk assessments will be undertaken by Line Managers where required to identify suitable control measures including options available for exiting premises in hours of darkness. Line managers will manage the risks of Lone Working by:
– Identifying individuals who may be at risk such as those that work alone on site or work or travel alone in or to community settings.
– Completing risk assessments for lone workers outlining the specific risks and detailing the agreed local procedure, fully investigating the different situations of lone working and working late
– Ensuring that the local procedure for safety when lone working is agreed with staff, that staff use it in their day to day work and that it is effective.

Line Managers should, at a minimum, include the requirement for all lone workers and enable them:
– To supply Personal Details information including contact details, car details and next of kin information
– To have access to a telephone when working alone
– To maintain an appointment diary that is accessible to others, provides details of location, and up- to-date
– To ensure someone is aware that they are working alone.
– To contact their line manager or designated person to let them know they are home safely

Managers should refer to the Lone Working Guidance for more detailed information on how to ensure you have appropriate safeguards in place.

12. First Aid

The CCG will comply with Health & Safety (First Aid) Regulations 1981 by:
– Completing a risk assessment of First Aid Needs with specific reference to individual staff members where appropriate
– Putting in place First Aid arrangements identified as necessary by that risk assessment
– Ensuring First Aid competence is maintained through training
– Co-operating with the Landlord and other employers within shared premises to ensure safe and sufficient coverage and that details are communicated to support a response requiring first aid.

The CCG will ensure, that a suitable number of trained personnel will be available within all the organisations office locations and that information to employees is provided regarding the identity of relevant staff, their location and the location of the first aid box.
This suitable number will be in accordance with the table below.

The CCG will:
– Ensure all staff are aware of the First Aid arrangements
– Display information about First Aid arrangements on the Health & Safety notice board
– Identify Appointed Persons and undertake to facilitate appropriate training and monitor refresher training of this person and first-aiders.

12.1 Appointed Person

A person will be appointed by the CCG to look after first-aid equipment and facilities and support and train First-Aiders. They can also provide emergency cover where a First-Aider is absent due to unforeseen circumstances (annual leave does not count). An appointed person does not need first-aid training.

12.2 First- Aider

A First-Aider is someone who has done training appropriate to the level identified in the needs assessment. This may be:
– first aid at work (FAW); or
– emergency first aid at work (EFAW);

Degree of hazard associated with CCG work activities	Number of employees in each office location	Trained first-aid personnel required
Low-hazard, e.g. offices,	Fewer than 25	At least one appointed person
	25–50	At least one first-aider trained in EFAW
	More than 50	At least one first-aider trained in FAW for every 100

In the event of a medical emergency, the ambulance service must be called by dialling 999 and clearly stating the nature of the emergency and the location. A medical emergency requires a prompt response and, therefore, the request to call the emergency services does not have to be passed to the Landlord's appointed person for action. A staff member should be sent to inform Reception and wait for the Ambulance/Paramedic at the building entrance to guide them to the patient.

13. Hazardous Substances

Suitable risk assessments will be undertaken to ensure staff do not become harmed in any way from exposure to hazardous substances in the workplace. Any potentially hazardous substances identified will be suitably stored and labelled correctly. Appropriate training and information will be provided to any staff that may use, store or handle hazardous substances. Suitable control and emergency measures will be in place to ensure appropriate action is taken in the event of a spillage, accident or injury.

Training will be provided to all staff who are required to handle such substances; and Protective personal equipment will be provided where appropriate. A full review of substances will be carried out at regular intervals by an appropriately qualified and experienced person.

Identification of hazardous substances will be made at the point of ordering and generally kept to a minimum. Where necessary, Material Safety Data Sheets will be obtained from suppliers to enable the risk assessment for users to be conducted in order to comply with the Control of Substances Hazardous to Health (COSHH) regulations.

Substances in use will be identified as part of environmental risk assessment.

14. Stress and Health and Wellbeing at Work

The organisation recognises its legal duty of care to its employees and appreciates that this applies equally to physical or mental health problems that can be caused or aggravated by work. These demands may arise from inside or outside work and can result in behavioural changes, impaired performance, physical symptoms and illness.

The organisation is legally obliged to undertake the management of work related stress. This is achieved by a risk assessment and management processes. Every manager who has responsibility for an area and/or work activity must ensure that suitable assessments are completed and acted upon - this responsibility cannot be delegated to another member of staff.

To assist, the Health and Safety Executive have identified six key areas of work design within the Management Standards http://www.hse.gov.uk/stress/standards/index.htm, which can affect stress levels. These are:
  – Demands – includes issues such as workload, work patterns and the work environment
  – Control – how much say the person has in the way they do their work
  – Support – includes the encouragement, sponsorship and resources provided by the organisation, line management and colleagues
  – Relationships – includes promoting positive working to avoid conflict and dealing with unacceptable behaviour
  – Role – whether people understand their role within the organisation and whether the organisation ensures that they do not have conflicting roles
  – Change – how organisational change is managed and communicated

The CCG has a separate policy on Health and Wellbeing of staff. This policy serves to demonstrate the organisations commitment to staff health and well-being and includes coverage of
  • Management of stress
  • Smoking
  • Promoting positive mental health
  • Misuse of drugs and alcohol
  • Domestic abuse
  • Gambling

The CCG will provide trained Mental Health First Aiders at Work to support staff.

15. Bullying and Harassment

The CCG is committed to creating a work environment free of Harassment and Bullying for all employees, where everyone is treated with dignity and respect and protected from harassment, intimidation and other forms of bullying at work. A separate policy exists that provides explanation of what bullying and harassment are, what help and support is available and how incidents are dealt with.

16. Waste Management

Waste will be managed effectively and thought will be given to waste materials to determine whether they can be reduced, reused or recycled in any way. Where this is not an option, all waste materials will be disposed of safely and suitable receptacles will be provided at all locations for storing waste until it is disposed of in a suitable manner. All waste will be appropriately packaged, contained and labelled to ensure safe handling and travel to the final disposal point.

Arrangements for waste disposal will be made locally for any CCG office locations and information made available to all staff that use those sites, with explanations made available to visitors and contractors working for the CCG at those sites.

17. Electrical Work Equipment

The CCG will comply with the Provision and Use of Work Equipment Regulations 1998 by:
  – Ensuring work equipment is suitable and fit for purpose
  – Ensuring equipment is maintained at intervals advised by the manufacturer
  – Regularly maintaining electrical equipment through Portable Appliance Testing (PAT)
  – Ensuring any member of staff using work equipment has been shown how to use it safely
  – Identifying any work equipment that creates significant risks to user or others, completing a risk assessment to determine safe ways of working

Responsibility for each buildings electrical safety tests, services and plant rests with the property landlord, who is responsible for identifying when maintenance is needed and for putting in place planned preventative maintenance procedures

NHS Property Services (NHSPS) will arrange for portable appliance testing (PAT) on all electrical equipment in CCG locations. This will be undertaken by Local authorities if buildings are not maintained by Property Services

18. Manual Handling

In accordance with the Manual Handling Operations Regulations 1992, manual handling risks will be eliminated where possible. If risks cannot be eliminated then risk assessments will be carried out for any task where there is a risk to a person who is required to move an object through pushing, pulling, carrying, lifting or lowering.

The assessment will consider the task, the load, the physical capability of an individual and the working environment and will be subject to review should conditions change

Such assessments will consider the elimination of hazardous manual handling activities and where required or appropriate, manual handling equipment will be provided.

Training, and information will be given to key staff by competent people and will form part of the statutory/mandatory training programme.

19. Health and Safety Training

Health and safety training and advice will be provided to all staff as appropriate to meet the organisations statutory duties. This will include an Induction programme on commencement of employment and regular refresher training thereafter. In addition to this, additional training may be identified as a result of specific risk assessments or through recommendation made by the organisation's Governing Body.

20. Monitoring Compliance and Effectiveness

Monitoring Compliance and Effectiveness

Monitoring performance against compliance to this policy and its effectiveness will include:
* The organisations safety management system will be subject to annual audit to identify gaps in compliance
* Action plans will be generated to address concerns where non-compliance is identified
* All health and safety policies and procedures will be regularly audited, monitored and reviewed. Time scales for review are written into policies and procedures to ensure they remain up to date
* Monitoring of incident reports to identify trends
* Risk Assessor departmental coverage

This policy will be reviewed on an annual basis (or sooner if significant changes occur). Reviews will take the following into account:
* Legislative changes;
* Good practice guidance;
* Case law;
* Significant incidents reported;
* New vulnerabilities; and
* Changes to organisational infrastructure

21. Countering Fraud and Security Risks

The overlapping interests of security management and counter fraud are fully recognised. The Local Security Management Service will liaise closely with the Local Counter Fraud Specialist (LCFS) to ensure incidents which could be constituted as theft or fraud are appropriately investigated.

22. Equality Impact Assessment

Under the Equality Act 2010 no-one should be disadvantaged or face discrimination because of any of these protected characteristics:

- Age
- Disability
- Gender Reassignment
- Marriage or civil partnership
- Pregnancy or maternity
- Race – including colour, nationality, ethnic or national origin
- Religion or belief – or lack of religion or belief
- Sex
- Sexual Orientation

All CCG employees are required to comply with this policy and in doing this must demonstrate sensitivity and competence in relation to the nine protected characteristics listed above.   An Equality Impact Assessment for this policy is shown at Appendix 1.

Glossary

CCG	Bristol, North Somerset and South Gloucestershire NHS Clinical Commissioning Group
So far as is reasonably practicable	This involves weighing a risk against the trouble, time and money needed to control it. Using "reasonably practicable" allows us to set goals for duty-holders, rather than being prescriptive. (Health and Safety Executive
Hazard	Something with the potential to cause harm
Risk	Means the likelihood that a specified undesired event will occur due to realisation of a hazard during work activities at department level or the effect of uncertainty on objectives
Organisation	Means the responsibilities and relationships between individuals which form the social environment in which work takes place
Audit/Auditing	A structured process of collecting information on the efficiency, effectiveness and reliability of the total health and safety management system and drawing up plans for corrective action

References and Associated Documents

Document	Weblink
The Health and Safety at Work etc Act 1974	http://www.hse.gov.uk/legislation/hswa.htm
Health and Safety (Display Screen Equipment) Regulations 1992	http://www.hse.gov.uk/msd/dse/guidance.htm
The Health and Safety (First-Aid) Regulations 1981	http://www.hse.gov.uk/pubns/books/l74.htm
The Equality Act 2010 Workplace (Health, Safety and Welfare) Regulations 1992	http://www.hse.gov.uk/pubns/books/l24.htm
Manual Handling Operations Regulations 1992	http://www.hse.gov.uk/pubns/books/l23.htm
The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013	http://www.hse.gov.uk/riddor/
HSE UK stress standards	http://www.hse.gov.uk/stress/standards/
Provision and Use of Work Equipment Regulations 1998	http://www.hse.gov.uk/work-equipment-machinery/puwer.htm
The Highway Code	https://www.gov.uk/guidance/the-highway-code/general-rules-techniques-and-advice-for-all-drivers-and-riders-103-to-158#rule149
BNSSG CCG Health and Wellbeing Policy	
BNSSG CCG Bullying and Harassment Policy	

Appendices

Appendix 1- Equality Impact Assessment

Query	Response	
What is the aim of the document?	This policy is a comprehensive statement that sets out the CCG position and governing principles with regard to Health and Safety. It should be followed by all staff, and is enforceable by management.	
Who is the target audience of the document (which staff groups)?	This applies to the following: • All members of staff directly employed by the CCG and for whom the organisation has legal responsibility • For those staff covered by a letter of authority/honorary contract or volunteers, the organisations policies are also applicable whilst undertaking duties for or on behalf of the CCG • Third parties acting on behalf of the CCG (Including commissioning support and shared services) • Agency, locum, interims and other temporary staff engaged by the CCG • Students, including those on work experience, trainees and apprentices • Visitors and members of the public	
Who is it likely to impact on and how?	Staff	Yes
	Patients	N/A
	Visitors	Yes
	Carers	Yes (Where they support staff)
	Other – Governing Body members, volunteers etc	Yes

Does the document affect one group more or less favourably than another based on the 'protected characteristics' in the Equality Act 2010:	Age (younger and older people)	No
	Disability (includes physical and sensory impairments, learning disabilities, mental health)	No
	Gender (men or women)	No
	Pregnancy and maternity	No
	Race (includes ethnicity as well as gypsy travellers)	No
	Sexual Orientation (lesbian, gay and bisexual people)	No
	Transgender people	No
	Groups at risk of stigma or social exclusion (e.g. offenders, homeless people)	No
	Human Rights (particularly rights to privacy, dignity, liberty and non-degrading treatment)	No

Appendix 2- Implementation plan

The following table sets out the dissemination, implementation and training provisions associated with this Policy.

Target Group	Implementation or Training objective	Method	Lead	Target start date	Target End date	Resources Required
Staff	H&S statement of Commitment signed by CEO	Produced and displayed prominently in common areas eg Kitchens	RH	16/8/19	16/8/19	Document and staff time
Staff	Promotion of revised Policy	Launch at Stand up and through the Voice	RH	4/9/19	4/9/19	Time on Stand Up agenda, material supplied to Comms
Staff	Access to Policy	Policy available on the Hub	Comms	4/9/19	4/9/19	Document and staff time
Building occupiers	Awareness of contribution required to provision of H&S to CCG staff	Communication through existing channels eg Tenants Forum	RH	4/9/19	30/9/19	Time on agendas
Staff	Launch of Home working Risk Assessment	Launch at Stand up and through the Voice	RH	4/9/19	7/9/19	Time on Stand Up agenda, material supplied to Comms
Governing Body	Receipt of assurance of H&S	Development of an independent audit and report completed by UHB and presented to Audit Governance and Risk Committee	RH	1/1/20	31/3/20	Revised H&S specification
Staff H&S reps/Risk assessors	Establish a representative group of staff to champion H&S responsibilities, undertake risk assessment and support corporate resources to	Identification of individuals with capacity agreed by Executive Team and establishment of meeting schedule and agenda	RH	1/1019	30/10/19	Staff time and training resource

	embed policy requirements					
Corporate Services	Production of suite of generic risk assessments covering common activities – lone working, manual handling, travel	Development of documents that can be tailored by managers/staff to support them address hazards	RH	4/9/19	30/9/19	Staff time
Staff	Launch of generic risk assessments	Launch at Stand up and through the Voice	RH	2/10/19	2/10/19	Time on Stand Up agenda, material supplied to Comms
Staff	Access to generic risk assessments	Documents available on the Hub	Comms	2/10/19	2/10/19	Document and staff time
Corporate Services	Finalise arrangements for incident reporting	Datix will be the tool used to report and record incidents. Configuration of this system is already underway.	RH	1/7/19	30/9/19	Datix system and staff time
Staff	Launch of Datix system for incident reporting	Launch at Stand up and through the Voice	RH	2/10/19	2/10/19	Time on Stand Up agenda, material supplied to Comms
HR	Complete Stress Risk Assessment	Engage SPF in the completion of this activity	HR Dept	22/10/19	29/11/19	Time on SPF agenda and staff time
Corporate Services	Develop arrangements for PEEPs for visitors	Guidance for meeting hosts on their responsibilities for the safety of visitors with disabilities or reduced mobility in the event of evacuation	RH	4/9/19	4/10/19	Staff time
Staff	Launch PEEPS for Visitors	Launch at Stand up and through the Voice	RH	9/10/19	9/10/19	Time on Stand Up agenda, material supplied to Comms
Corporate Services	Finalise draft of Lockdown Protocol for South Plaza	Complete development of document through Tenants Forum for adoption by all in South Plaza	RH	7/8/19	20/9//19	Staff time, commitment from other tenants

Staff & tenants	Launch Lockdown protocol	Launch at Stand up and through the Voice	RH	2/10/19	2/10/19	Staff time, commitment from other tenants